

Response to Comments on Mitigated Negative Declaration for the Homewood Relocation Project

Attached are the Responses to Comments, along with copies of the comment letters on the Mitigated Negative Declaration, for the Homewood Relocation Project.

The record for the Mitigated Negative Declaration includes all of the public and agency comments on the adequacy of the MND and responses to those comments. Responses were provided in writing to all written comments (see Letters 1 through 18). Written responses were also provided to comments received at the January 7, 2007, hearing. Comments and questions received at the February 6, 2007, Planning Commission meeting were either addressed during the meeting or had been made and addressed in writing previously. A transcript of the February 6, 2007, meeting was produced. All of these documents are being made available, or have been previously been submitted, to the Planning Commission and the public for review.

Additional letters on the project have been received and are included in the May 29, 2007 packet.

**Homewood Lumber Relocation
Responses to Written Comments
on the Initial Study/MND**

PCWA - (1)

PCWA confirms that water can be provided to the project on a first come first serve basis. In order to obtain water service, the applicant will need to enter into a facilities agreement with PCWA to provide any on- or off-site facilities needed to provide potable water and fire flows to the project site. This comment is consistent with the findings of the MND that water supply is available to serve the project site (page 72 of the MND).

PCWA requests that a hydraulic analysis be conducted to ensure that there is adequate flow for fire protection purposes. As discussed above, the applicant will need to provide any improvements necessary to ensure that fire protection is adequate. The conditions of approval (#40) require that the applicant install water lines to the satisfaction of PCWA, which could include a hydraulic analysis.

PCWA staff has indicated that a transmission line that serves properties along Sierra College Boulevard and Taylor Road near the Rocklin/Loomis border is near capacity.¹ Therefore, fire flow pressure may not be adequate to serve the project site. According to Bob Richardson, Assistant Fire Chief, water pressure in the area is currently adequate to serve the project. However, if other projects come on line before the Homewood project, the capacity of the transmission line would be reduced. Eventually, PCWA plans to improve the transmission system in the Loomis/Rocklin area, but the improvements may not be constructed before Homewood is relocated. If the hydraulic analysis determines that increased pressure is needed, the applicant could install the infrastructure needed to increase pressure to adequate levels (most likely replacing a pipeline) and then be reimbursed by PCWA as fees are collected; participate with other developers in the installation of such infrastructure; or, if the larger PCWA improvements are installed prior to occupancy of the project site, simply pay applicable fees to PCWA.

No plans are available at present for short-term or long-term improvements, so the alignments of the pipelines are not known at this time. Most if not all of the transmission line would be in roadway rights-of-way. Construction of such improvements would not be expected to have permanent, significant environmental impacts. There would be some impacts during construction (e.g., noise and air emissions), but these would be temporary, and would be mitigated by compliance with the applicable Town, City or County codes (limiting construction hours, for example) and PCAPCD construction measures and rules.

Timothy D. Taron, Hefner, Stark & Marois - (2)

Mr. Taron represents Rocklin Crossings, a commercial project proposed to be developed in the City of Rocklin. According to Mr. Taron, a hydraulic analysis was prepared for the Rocklin Crossings project, and that analysis assumed development of the Homewood

¹ Tony Firenze, Engineer, Placer County Water Agency, personal communication, January 18, 2007.

project. The preliminary results indicated that both the Rocklin Crossing and Homewood projects will affect the operation of PCWA's system. Mr. Taron suggests that all parties work together to create a funding mechanism and improvement plan to ensure that the improvements are in place. Mr. Taron specifically requests that the Town include a condition of approval that requires that water system improvements be in place before the project opens.

As discussed in response to PCWA's letter, the applicant will need to prepare a hydraulic analysis to determine whether water pressure to the project site is adequate for fire flows. PCWA will determine what, if any, improvements will be needed to serve the project, and the appropriate mechanism for funding and building those improvements. The appropriate mechanism will depend in part on timing (i.e., if project occupancy precedes transmission line improvements, the applicant may be required to install improvements, but if the improvements have already been installed at the time of occupancy, the applicant may only need to pay fees toward the cost of improvements).

United Auburn Indian Community - (3)

The introductory comments reiterate the findings of the MND that cultural resources could be located below the surface of the project site. The commenter requests that language be added to the MND to ensure proper consideration of potential effects on Tribal cultural resources.

1. As requested, Mitigation Measure 14 has been revised to include consultation with the UAIC if prehistoric resources are discovered during construction.
2. The requested change is already required by law. Nonetheless, a condition of approval has been added to require that the Placer County Coroner be contacted if human remains are discovered, and that if such remains are of Native American origin, then the Native American Heritage Commission will be notified, and the Most Likely Descendant will be consulted regarding the appropriate disposition of the remains of any grave artifacts that are discovered.

Andy Darrow, Development Coordinator, Placer County Flood Control and Water Conservation District - (4)

1. Comment noted. Per Mitigation Measure 21, the project will comply with the District's requirements.
2. Mitigation Measure 21 requires that the applicant demonstrate that on- and off-site drainage facilities are adequate to accommodate additional flows from the project site. The analysis must be consistent with the Placer County Storm Water Management Manual. Measure 21 has been revised to specifically require that the preliminary drainage report be provided to PCFCWCD for review and comment.
3. The analysis required by Measure 21 would address fill in the 100-year floodplain.

Scott Bradley

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1. Noise: The comment is correct that noise levels will increase, but as discussed in Item 11 of the MND, mitigation will ensure that Town noise standards are met, so the impact would be less than significant.
2. Traffic: The comment is correct that traffic would increase with development of the proposed project. Mitigation to ensure that Sierra College Boulevard operates adequately is identified in Item 15 of the MND.
3. Safety: Heavy equipment will be confined to the site. Trucks will not use Brace Road east of the project site. The intersection of Brace Road and Sierra College Boulevard will be controlled by a signal. There will be sidewalks along the project boundary on the south and west. For these reasons, there should not be safety issues or conflicts between bikes and pedestrians.
4. Visual Esthetics: The visual quality of the site will change. It should be noted that the site is already designated GC, and so it has been assumed to be developed in the Town's General Plan. It is not clear from the comment how the development of 39,000 square feet of "industrial buildings" would be inconsistent with the General Plan. Note also that the project design must go through design review, and is not intended to look "industrial".
5. Zoning: The project would be allowed under a Light Industrial zoning. The project includes amending the Zoning Ordinance to allow assembly of premanufactured goods. With this amendment, the project would also be consistent with the GC zone. Please also see responses to Kai Krienke's comments.

Norbert J. Perduta

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The commenter states that the project should be located in a light industrial area. The proposed project would be allowed in a light industrial area, but, with the possible exception of the door assembly component, the project is also allowed within the General Commercial zone. The proposed revision to the Zoning Ordinance would allow assembly operations within General Commercial zones.

The comment is correct that the proposed project would increase traffic and noise, although, with mitigation, Town noise standards would be met (see Item 11 of the MND), and traffic impacts would be less than significant (see Item 15 of the MND). As stated on page 68 of the MND, under future conditions, decelerating trucks on Sierra College Boulevard could slow traffic flow. One option would be to close the Sierra College Boulevard, as indicated in the comment. However, the traffic study identifies another option, a deceleration lane on Sierra College Boulevard (see Mitigation Measure 33 on page 68). Further, the conditions of approval (#37) prohibit the use of Brace Road by delivery vehicles (except for those making local deliveries).

Homewood would not operate 24 hours a day. Regular business hours would be from 7am to 7pm, Monday through Friday, and 8am to 5pm on Saturday. A small staff would be onsite from 5pm to 10pm or later, but not after midnight. The Conditions of Approval limit truck deliveries, parking lot sweeping and garbage pick-up to the hours of 7:30 a.m. – 6:00p.m. weekdays and Saturdays. As discussed in Item 11, with mitigation, noise levels at night would meet Town standards. Regarding the suggestion that a commercial enterprise would not cause these concerns should be found for the project site, any commercial activity would generate traffic. Some uses could generate more traffic than the proposed Homewood project. Most commercial enterprises also generate noise from traffic, delivery vehicles, and loading and unloading. Depending on the commercial use, the noise levels could be lower than the proposed Homewood project. However, since the proposed project would not have any significant impacts that could not be mitigated to a less-than-significant level, CEQA does not require that alternative uses be considered for the project site. Nonetheless, the commenter's preference for a different but unspecified commercial enterprise at the project site is noted.

Drainage is addressed in Item 8 of the MND. Mitigation Measure 21 requires that the proposed project demonstrate that drainage facilities can accommodate increased flows from the project, so flood conditions upstream or downstream would not be exacerbated.

The opinion that property values would go down as a result of the project is noted.

Randy Howard - (7)

The comment that the project site is not the proper location for this type of business is noted. The comment does not address the adequacy of the MND. With respect to the statement that the area has always been strictly residential, the project site and the area south of the project site (adjacent to Sierra College Boulevard) have been designated for non-residential uses since before incorporation of the Town.

Kai Krienke - (8)

Lines 1 through 18: Salutations and introductory remarks; no response is needed.

Lines 19-29: The taped outlines of the buildings at the January 20th site visit provided a sense of scale and general location of the various components of the project. Although an exact representation was not possible, the outlines did provide some information. The measurements that must be accurate, and that will be used in consideration of the project (with respect to setbacks, building size, and so on), are those found on the Tentative Map.

Lines 30 to 36: The comments regarding the appropriateness of the proposed zoning change and the project are noted. The effects of the change to the zoning ordinance, including impacts on the local residential community, are evaluated throughout the MND.

Lines 37 and 38: No land uses are referenced in this section of the MND; it is intended to enable the reader to identify the location of the project site.

Lines 38-47: The MND assumes that both Phase 1 and Phase 2 will ultimately be developed. The combined acreage of the two phases is approximately 5.4 acres, which is comparable to the existing Homewood site. The use of the flood fringe (Phase 2) is acceptable so long as the mitigation is implemented. No development is proposed or allowed in the floodway.

Lines 48-86: The zoning amendment proposed as part of this Project by the Town is to allow "assembly of building components" with the approval of a Minor Use Permit in the CG zone. Manufacturing is not included in the project description and therefore would not be allowed as part of the project (as would be interpreted by the Planning Director or Planning Commission). The MND is required to only address the environmental impacts of the described proposed project. It is not unusual for uses to be allowed in several zoning district. The comments that the Homewood facility is a better fit with the ILT zoning district, that it is vibrant manufacturing facility, and that assembly versus manufacturing is semantics are noted.

Lines 87-96: The MND states on page 2 that the applicant stockpiled 1,500 cubic yards of dirt on the project site, and that the Town required that grading cease until a tree permit and project approval were obtained. No grading has since occurred. The fill was outside of the floodplain. Regarding hydrology, the applicant must demonstrate that any uses in the flood fringe will not exacerbate flood conditions, per Mitigation Measures 21 and 22. In addition, the applicant must offset the loss of wetlands through the purchase of wetland credits based on a wetland delineation (Mitigation Measure 10).

Lines 97-122: Because the fill was outside of the floodplain, it would not affect flooding conditions upstream.

Lines 123-147: Mitigation Measure 21 requires that the applicant demonstrate that drainage facilities can accommodate additional flows from the project site, consistent with Town and Placer County flood control provisions. This measure, which applies to both Phase 1 and Phase 2, will ensure that the project does not exacerbate flood conditions on other properties. With respect to wetlands, please see the response to Lines 87-96.

Lines 148-311: The decision as to whether an amendment should be made to the Zoning Ordinance is vested with the Planning Commission and Town Council by Town Ordinance, who will be considering the reports, letters and comments on the zoning amendment and project prior to this decision. In this case, the project is also subject to a Conditional Use Permit which requires specific findings of compatibility with the surrounding properties. Opinion and statements are noted regarding appropriateness of Homewood project in CG versus ILT district. Zoning Ordinance lists building and landscape materials sales - which is a general category of land use rather than a listing of all components of a building and landscape material sales business.

Lines 312-313: The project is required to mitigate sound levels to a state of compliance with the Town's noise standards, not a level less than the Town's standards. Therefore, the ENA specifies the requirements needed to comply with the Town's noise standards.

Lines 313-314: The reciprocal saw was evaluated in the noise study based upon a stationary location, as outlined in Figure 1 of the ENA. Condition 73 requires that the table saw and reciprocal saw be located in the lumber storage building, adjacent to the entry off of Brace Road, and that noise baffles and absorbers be used and maintained to contain noise. With this condition, noise from the saw will not exceed, and could be lower, than assumed in the noise study.

Lines 314-315: The comment does not specify what criteria, beyond those identified in adopted City documents and used in the study, would be appropriate. Therefore, no response is possible.

Lines 315-317: Sound levels were evaluated at the property lines of the receiving land uses, as required by the Town of Loomis General Plan Noise Element. The standard receiving height for a property line noise standard is 5 feet.

Lines 319-322: The location of the truck loading/unloading area is clearly defined on the project site plan. Proposed activities at this location were analyzed in the ENA. Please see response to lines 313-314, above, regarding the reciprocal saw location. The ENA analyzed the fork lift movements based upon a full hour of operations located near the noise sensitive receptors. The analysis concludes that fork lift noise will comply with the Town's noise standards, after implementation of the outlined noise reduction measures.

Lines 322-326: New commercial projects are typically evaluated based upon their current proposed operations. Additionally, it is difficult to predict how operational changes at Homewood will affect overall sound levels. Because the Town's noise standards are based upon an hourly noise standard, the project must comply with the noise standards based upon the loudest hour of operations. Based upon noise measurements at the current Homewood facility, the proposed project would have one or two peak hours of noise generation per day with quieter hours of noise generation in between. Based upon discussions with the project applicant, there is a limit to the amount of activities that could occur on the project site during any hour due to site constraints. Therefore, if the proposed project were to increase its operations, it is likely that there would be an increase in the number of peak hours of noise generation versus an increase in the overall sound levels of the one or two peak hours.

Lines 326-329: The noise study and Table 7 of the MND clearly indicate that the reciprocal saw noise levels would be 29 dB L50 after implementation of noise reduction measures. This sound level complies with the Town's noise standard of 35 dB L50 for repetitive/tonal noise sources. Additionally, this sound level is approximately 11 dB

quieter than the quietest nighttime hour measured at the proposed site, as indicated on Figure 2 of the ENA.

Lines 331-342: There are a variety of construction materials which can be used to provide the required acoustical noise reduction for the proposed lumber storage buildings. The mitigation measures in the ENA clearly outline the acoustical performance criteria required. The mitigation also requires an additional acoustical review of the proposed lumber storage buildings prior to construction. This review will ensure that all acoustical requirements have been implemented prior to construction.

Lines 342-347: The ENA assumed that the lumber storage building along the east property boundary would extend north to within approximately 20 feet of the 100 year flood plain. The revised site plan shows the soundwall extending north from the lumber building to edge of the 100 year flood plain. This wall and building combination is intended to reduce noise levels east of the project site. As discussed previously, the applicant must demonstrate that the site design and materials to be used in the lumber storage building and the soundwall will achieve Town noise standards.

Lines 355-357: Please see responses to lines 312-313 and 322-326.

Lines 357-361: Table 7 of the MND indicates that the project would comply with both the Loomis daytime and nighttime exterior noise level standards, after implementation of the mitigation measures.

Lines 366-377: The proposed project is predicted to generate noise levels which would comply with the Town's noise standards, after implementation of mitigation measures. Additionally, the predicted project-related noise levels, after implementation of mitigation measures, would be significantly less than current ambient noise levels in the project vicinity during all hours of proposed operation, as shown on Figure 2 of the ENA. Therefore, while sound levels from the proposed project may be audible at times, it is unlikely that the proposed project would cause a significant increase in overall ambient noise levels.

Note that the MND identifies mitigation to ensure standards are met. The comment is correct that mitigated noise levels would be at the top end of the standards, based on the analysis done to date. However, there is no evidence that the standards would be exceeded, and the applicant must demonstrate that the standards are met after the project is constructed and occupied. It should be noted that the standard of 40 dBA L50 is relatively low, and that it is below the current noise levels.

Lines 378-385: The project buildings will be setback from the street and landscaped. At a proposed 20 to 30 feet tall (the Zoning Ordinance allows up to 35 feet), the buildings will appear tall (similar in height to the apartments across the street), but will not impede views of the sky, particularly along Sierra College Boulevard, which will eventually be six-lanes wide. Setbacks are required on both Brace Road and Sierra College Boulevard,

and the buildings will be landscaped, which will further reduce the apparent scale of the project.

Lines 385-391: About 75 percent of the trees on the Phase 1 and 2 sites are proposed to be removed. The trees in the 3.6-acre floodway will be retained. As the comment notes, the views of the site will change, particularly from Sierra College Boulevard and Brace Road. However, the project site is not designated open space or identified as a specific scenic resource. To the contrary, it is designated for General Commercial development, and any other commercial project would also require the removal of trees (although perhaps more or fewer than proposed by Homewood), and would change the visual character of the project site.

Lines 391-394: As discussed throughout the MND and these responses, mitigation measures have been identified for every significant impact, and those measures would reduce impacts to less-than-significant levels.

Lines 395-398: The project lighting plan will be reviewed during design review, and the types of light standards to be installed must be identified at that time. The light standards must meet Town requirements for night-sensitive lighting, and, pursuant to Mitigation Measure 2, must not illuminate adjacent residential properties. Once the project is constructed, the Town will inspect the site to ensure that the lights are properly shielded and directed away from residences, as required by the Mitigation Monitoring Program.

Lines 399-406: Carbon monoxide emissions typically occur at congested intersections where many cars are idling repeatedly. Due to changes in fuel mixtures, such CO “hot spot” emissions violations are increasingly rare. The proposed project would not generate enough traffic to cause a violation of the CO standards.

Lines 406-413: Homewood is not likely to generate noxious odors, but if a violation of the ordinance occurs for any reason, the staff and APCD will enforce it. The APCD and Town staff will also enforce the requirements that idling engines be turned off after 5 minutes.

Lines 414-423: As discussed on page 30 of the MND, the only special-status species that would use the project site are raptors and loggerhead shrike. These species would be unlikely to be affected by the fill that was placed on the site (which was not part of the Proposed Project, and therefore identified as an existing condition rather than a project impact), because they nest in trees and could fly away if foraging. Other non-listed species could have been affected; however, the loss of habitat for wildlife in general is not considered a significant impact. Because of its relatively small size and proximity to a drainage corridor, loss of habitat provided by the project site would not substantially reduce the numbers or range of wildlife. Furthermore, except during high flows, wildlife that cannot fly can use the drainage corridor to travel.

Lines 424-428: The level of analysis for the MND was appropriate. As stated on page 35 of the MND, the entire nine acres of the project site was surveyed by an archaeologist

and no evidence of cultural resources was found. Therefore, it is unlikely that the site has any historic or prehistoric resources on it, and additional evaluation (through excavation, for example) was not deemed to be necessary. However, any site in western Placer County has the potential to contain subsurface resources, which would not be visible during a field survey. Mitigation is typically identified requiring that work stop if any resources are uncovered until the resources can be evaluated and recovered.

Lines 429-431: Water flow and flooding do not adversely affect the aquifer, which is located well below the surface. The connection to groundwater inferred by the comment is not clear.

Lines 431-438: As discussed above, Mitigation Measure 21 requires that the applicant demonstrate that drainage facilities are adequate to accommodate increased runoff from the project site. This measure would protect other properties up and down stream from the project site. Measure 23 would improve the Town's access to drainage facilities, but is not required to ensure that runoff from the project does not exacerbate flood conditions.

Lines 439-447: None of the Phase 2 floodplain fringe would be used before a CLOMR is received from FEMA (Mitigation Measure 26) and the applicant has demonstrated that on and offsite drainage facilities can accommodate additional flows from the project site consistent with the Town and Placer County Flood Control and Water Quality District requirements (Mitigation Measure 21). Therefore, the flood fringe cannot be used until effects on flooding and required drainage infrastructure have been reviewed and approved by the appropriate agencies. The Town will be responsible for monitoring compliance with Measure 25, which allows only temporary storage of materials in the flood fringe.

Lines 448-460: The project site is not developed, nor is it located in the midst of linked land uses, so the project will not "physically divide" (such as a freeway cutting through a residential neighborhood would). Traffic would travel on established roads, so it would not divide the community. Very little traffic is expected to use Brace Road, except adjacent to the project site. It is not clear from the comment what mitigation would be necessary to address the commenter's concerns regarding zoning issues that would result in environmental impacts.

Lines 461-469: The conclusion that additional roadway capacity will be needed is distinct from the issue of "physically dividing" a community, discussed in Item 9, Land Use and Planning.

Line 470-475: The issue addressed on page 64 of the MND has to do with electrical infrastructure, not overall supply. The Proposed Project would use a similar amount of energy as it currently uses, which represents a very small percentage of PG&E's overall supply. With PG&E review of Improvement Plans (per Mitigation Measure 31), no conflict with the 60kV line should occur, so residential service would be uninterrupted.

Lines 476-481: Staff has reviewed all of the setbacks and the Tentative Map has been revised to reflect the required setbacks, including a 15-foot setback adjacent to the eastern boundary.

Lines 482-490: Brace Road will be widened adjacent to the project site to provide a center lane for left turns into and out of the project site. A deceleration lane will be provided adjacent to the project site on Sierra College Boulevard so that slowing trucks do not impede through traffic.

Lines 490-500: The improvements to Brace Road and Sierra College Boulevard must meet Town standards for public streets. The road striping will allow all turning movements in the area.) The Town's Bike Master Plan designates Brace Road as a Class III bike route – a shared roadway with bikes and motorist. No specific markings are required for a Class III bike route. However, during design and engineering of the road improvements, the proposed striping on Brace Road could be modified to allow more room along the project site, if deemed beneficial.

Lines 501-507: Delivery trucks would arrive during business hours, and, in some cases, shortly before Homewood opens or after it closes. Delivery trucks (including 18-wheel trucks) would not be accessing the project site in the evenings or at night. Queuing would occur within the project site, although a truck may be waiting for a short time before the gates are open. Homewood trucks may leave within two hours of opening, but they would have access to the project site, so they would not queue. After hours activities would take place entirely within the project site.

Lines 508-513: The project applicant has stated that Homewood has not used the rail line in Loomis, and has no plans to do so. Homewood does use railroad offloading at McClellan and in Woodland.

Para 514-520: As discussed on page 69, as revised, of the Initial Study, the Proposed Project as originally proposed provided enough parking to meet the Municipal Code requirement. The project has since been designed to provide additional parking, recognizing that employees will use a large portion of the spaces. According to the applicant, approximately 45 employees are commonly on site during the day and use 40 parking spaces. The first phase is proposed to have 47 spaces. In order to ensure that there is adequate parking for employees and customers at peak periods under Phase 1, the Conditions of Approval require an additional 15 spaces for a total of 62 spaces (Condition 106). Once Phase 2 is completed, there will be a total of 82 spaces, which will be adequate to meet both employee and customer demand. To further ensure that the adjacent neighborhood is not subject to overflow parking, no parking will be allowed for this project on Brace Road or Sierra College Boulevard (Conditions 32 and 89).

Lines 521-539: The proposed project is not considered “manufacturing, processing and warehousing,” and the door assembly component is only a small part of the overall

lumber sales aspect. If the zoning suggested by the commenter was used, the proposed project would generate a need for 46 parking spaces. Since 50 spaces are provided, the project would be in compliance. Please also see the response to lines 514-520.

Lines 540-543: As noted on page 69 of the MND, temporary parking will be provided in the Phase 2 site prior to its being fully developed.

Lines 544-551: Cumulative impacts were considered throughout, with quantitative analysis conducted for traffic and air quality in particular. In every case, the project contribution to cumulative impacts was not considerable, or could be reduced to a less-than-significant level through mitigation.

Lines 552-558: The MND does consider Phases 1 and 2 together, and it is the Town's and the applicant's intent that both phases ultimately develop.

Lines 559-613: The comment summarizes prior comments. Please see previous responses.

City of Rocklin (January 22, 2007) - (9)

1. Water Supply: The Proposed Project must obtain a "will serve" letter from PCWA in order to operate. PCWA will consider both supply and infrastructure (e.g., pressure needed to support fire flows) in its evaluation of its ability to serve. Based on available information, PCWA appears to have adequate supply (see January 4, 2007 letter), but may require improvements to water lines in order to achieve appropriate fire flow pressure. Applicants will need to either construct the improvements or pay fees toward the improvements that another entity is building. In some cases, a smaller project may be able to make relatively small improvements (e.g., replacement of a pipeline segment) if the improvements to the larger system are not completed when needed. PCWA has not identified or approved the improvements that would be required for the system as a whole, so it is not known what alignments would be affected. It is likely that any pipelines would be located in roads or rights-of-way, so significant impacts (e.g., substantial loss of agricultural land, cultural resources and/or biological resources) would not likely occur. Once installed, the pipelines would not have ongoing environmental impacts because they would be under ground.
2. Flooding: Mitigation Measure 21 requires that the applicant demonstrate that drainage infrastructure is adequate to accommodate increased runoff from the project site. The project will need to comply with both the Town's stormwater management manual and the PCFCWQ Stormwater Management Manual and the Dry Creek Drainage Master Plan, (see the Mitigation Monitoring Plan). Such infrastructure could include onsite detention or retention if necessary.
3. Traffic: Mitigation Measure 33(a) makes clear that the eventual section of Sierra College Boulevard adjacent to the project site will be a six-lane roadway. The auxiliary lane will be part of the ultimate six lanes. Access to Sierra College

Boulevard will be confined to right-in, right-out, and, as required by Mitigation Measure 33, the deceleration lane must be constructed by the applicant. The Town is working with the City of Rocklin on the Sierra College Boulevard improvements.

City of Rocklin (May 5, 2007) - (10)

1. The comment is correct that the Town intends to construct Sierra College Boulevard improvements to be consistent with the South Placer Regional Transportation Association plans.
2. As discussed above, the applicant must meet PCWA requirements in order to obtain water service.
3. Mitigation Measure 21 and Condition _____ require that the Proposed Project comply with the PCFCWQ Stormwater Management Manual.

Janet Thew

(11)

Page 32: Measure 10 has been revised as requested.

Page 32: Measure 11 has been revised as requested. .

Page 34: The comment is correct that the impact on trees would be less than significant only if the Mitigation Measure 13 is implemented. Measure 13 has been incorporated into the Conditions of Approval, and must be implemented by the applicant. The tree mitigation plan must comply with Measure 13 and the Town's tree ordinance, subject to approval by the Planning Commission.

Page 40: The grading ordinance that is in place at the time that the grading permit is issued will apply to the project. The new grading ordinance was approved on February 13, 2007, so the new ordinance will apply to the Proposed Project.

Page 48: The MSP addresses water quality, and should have been developed with the General Plan in mind, so development of this site would have been assumed. The project applicant is required to follow the Town's NPDES permit, so the applicant's engineer will need to provide appropriate detention and/or use pervious asphalt to reduce runoff.

Page 57: The proposed project must meet the Town's noise standards at the project site property line. Therefore, the noise standards will be met at the apartment building, which is across Brace Road. For the most part, the lumber storage building will block line of sight to noise sources on the project site, except for the occasional vehicle crossing the driveway.

Page 68: Neither the applicant nor the Town anticipate eliminating access to Sierra College Boulevard. Rather, consistent with the Traffic Study recommendations, access will be restricted to right-in and right-out, and improvements to Brace Road will be made

to allow lefts into the project site (see Mitigation Measure 33). The comment is correct that if Brace Road were the only access, there would be an increase in traffic noise adjacent to the southern boundary of the site, but it would not likely exceed noise standards due to low overall traffic volumes on Brace Road. Still, it would be more noise than if the Sierra College Boulevard accesses are used.

Page 74: The suggested revisions have been made. It should be noted that, with mitigation, the project contribution to cumulative impacts would not be significant.

Kai Krienke (January 25, 2007) (12)

The first two paragraphs express the commenter's dissatisfaction with the procedures used to run the Planning Commission meeting. The comment is noted. The Planning Commission chair determines how the meetings will run, including the length of time allowed for public comment. It is common in many jurisdictions to limit the length of time that individuals are allowed to address an issue in order to ensure that everyone has an opportunity to speak. Members of the public may also submit written comments of any length.

The applicant is usually given additional time to present the Proposed Project, such as occurred at the February 6, 2007, meeting. With regard to the applicant's responding to questions from the Planning Commission, such responses are not usually considered part of the applicant's presentation, because the consultants are responding to the Commissioners questions in order to better understand the project and the environmental information.

The lumber shed would be designed to reduce noise levels in those areas where Town standards would be exceeded if no mitigation was employed, specifically, the southern and eastern boundaries of the project site adjacent to residential development. The Town noise standards would not be violated north or east of the project site, so no mitigation is needed along these boundaries.

The ambient noise levels were reported to be 58 dB Ldn (see Figure 2 in the noise study), which is considered conditionally acceptable for residential areas. As stated on page 3 of the noise study, the existing noise environment is defined primarily by local roadways, but the railroad tracks located north of Taylor Road and Interstate 80 (which is ¼ mile from the project site) also contribute to the ambient noise environment.

The 30 18-wheel trucks identified in the traffic study would not use Brace Road east of the project site, because it would not provide convenient access to Interstate 80 or other destinations. Brace Road adjacent to the project site would be improved to provide a left-turn lane into and out of the project site. Therefore, these trucks would not create gridlock on Brace Road.

The comment raises questions about the sequence of events regarding the grading of the project site, but does not indicate how the applicant's description was inaccurate, or

identify (beyond the issue of grading) how Homewood has failed to “police themselves” in the past.

With respect to the hearing notice, the Proposed Project has been noticed and heard consistent with the above requirements of State law. The Proposed Project has been included in the online project status report on the Town website, since the application was received in May, 2006. At a previous hearing on the Brace Ranch project, the people attending were concerned about the project and staff noted that (1) an application had been received and (2) that it would be the subject of environmental review and a public hearing. Staff added Ms. Benson and Ms. Coles to the mailing list for the hearing notice because of their comments at the Brace Ranch hearing. Since then, staff has added the names of addresses of all speakers and letter-writers to the noticing list.

The comment requests a delay in the processing of the zoning ordinance amendment and consideration of the MND. The Commission held a second hearing to address the project and MND, and continued consideration of project approvals, so action has been delayed.

Larry Monahan (13)

The comments opposing the proposed zoning ordinance amendment and suggesting that the Homewood project should relocate to another site are noted.

A traffic study was prepared for the proposed project, and concluded that the increase in traffic due to the project would be less than significant with mitigation (see Item 15 of the MND).

Richard Delaney, West Coast Mobile Home arks, Inc. (14)

The comments that the concerns expressed by residents can be addressed through landscaping and operation restrictions and the support for the proposed project are noted. The proposed project would not operate 24 hours a day, although some activity on the project site could occur into the evening and nighttime, and there would be some activity early in the morning. Noise attenuation measures are required by Mitigation Measure 27, which addresses both the use of the lumber storage building as a noise barrier and onsite operations.

Arlene Monahan (15)

The comment that the Homewood project should be located in an industrial area and not at the project site is noted.

The proposed project would not be operating 24 hours a day or 7 days a week. Most activity would occur between the business hours of 7am and 5pm, Monday through Friday, and 8am through noon on Saturday. A small staff would be preparing for next day deliveries in the evenings and at night (generally not past midnight) and some Homewood trucks would leave the site as early as 5a.m.

As discussed previously, Brace Road would be used by project traffic, but it is not anticipated that, with the exception of local deliveries, that project traffic would travel east on Brace Road past the project site.

The proposed project would increase noise, but, with mitigation, Town standards would be met.

Steve and Sharon Oerding (16)

The commenter has submitted a letter and copies of several publications related to air quality. The majority of the publications focus on ozone. A few of the publications address other pollutants, for example, diesel exhaust emissions and particulate matter.

Ozone is a gas that is formed when reactive organic gases (ROG) and nitrogen oxides (NO_x)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures create conditions that are ideal for ozone formation. Ozone can cause eye irritation and respiratory impairment. Because of the way that it is created, proximity to ozone precursors is not the same as exposure to ozone. The effects that are described in the articles provided by the commenter are the result of ozone being created in the air basin, rather than at a particular site. In contrast, pollutants like carbon monoxide and particulate matter can adversely affect people in proximity to the source.

The air quality analysis, as reported in Item 3 of the MND, specifically quantifies the project-related change in ozone precursor emissions, as well as carbon monoxide and particulate matter (PM₁₀). The MND presents a quantitative evaluation of the project-related change in these emissions associated with construction activity, use of motor vehicles and area sources (e.g., natural gas). The air quality analysis also specifically quantifies the project-related change in diesel exhaust emissions. The analysis prepared for the environmental document includes an assessment of the project-specific level of heavy-duty diesel truck travel.

As shown in Tables 2 and 3 of the MND, construction and operation of the proposed project (including traffic) would not exceed thresholds that have been set by the Placer County Air Pollution Control District (PCAPCD) to determine if a project would significantly degrade air quality.

Although construction activities would not exceed PCAPCD thresholds, the MND recognizes that dust and other construction-related emissions could annoy neighbors for short periods (see page 24 of the MND). Mitigation Measures 3 through 5 require a dust control plan and restricts the type of equipment that can be used. These measures would further reduce the generation of dust and other construction emissions.

Mitigation Measure 7 requires that the applicant consult with the PCAPCD and obtain and comply with a permit for project operations, if applicable. The permit would include measures to ensure that operational, non-vehicular emissions are acceptable.

The PCAPCD has also identified a threshold for nitrous oxide emissions (an ozone precursor) under cumulative conditions. This threshold is lower than the project-specific threshold, because it takes into consideration future increases in emissions from other development throughout the air basin. This cumulative growth would further increase ozone by increasing the emission of ozone precursors from the additional traffic and other activities. The NO_x threshold is only 10 pounds per day. The proposed project is estimated to generate 17.17 pounds per day of NO_x. Mitigation Measure 8 requires that the applicant contribute to PCAPCD's emission offset fund or obtain emission reduction credits for the amount of NO_x that would exceed 10 pounds per day. The fund is used to reduce ozone precursor emissions in Placer County to offset the increase by the development paying the fee. For example, if a diesel school bus is replaced by a natural gas school bus, there will be a reduction in NO_x emissions. Emission reduction credits also ensure that the net increase in NO_x emissions associated with the project would not exceed 10 pounds per day. This approach is feasible because ozone is regional in nature, rather than site specific. If emissions are reduced in one portion of the air basin, the basin as a whole will benefit.

Kai Krienke, February 6, 2007 (17)

Para 1: The conditions of approval included in the staff report reflect a detailed analysis of the proposed project, and are intended to ensure that the project meets all Town standards and implements all of the mitigation measures identified in the MND. Many of the conditions are standard measures applicable to any commercial project in Loomis. Others are specific to the project site, project operations and concerns expressed about the project.

The Proposed Project requires a Conditional Use Permit. A Development Agreement could also be required, but it is usually a tool used to address Zoning Ordinance requirements. The mitigation measures identified in the Initial Study and the Conditions of Approval are fully enforceable, and a Development Agreement would not make the measures more enforceable.

Para 2: The number of conditions and mitigation measures required of the Homewood project is not unusual for development projects in the Town. For example, the MND for the Poppy Ridge project, which would develop 16 residential units on 40 acres, had 29 mitigation measures. The Poppy Ridge project had 84 conditions of approval. The Taylor Road Mixed Use project, which would develop 40 single-family units and approximately 21,500 square feet of commercial space, had 36 mitigation measures and 93 conditions, many of which simply notify the applicants of Town Code requirements. Neither of these projects were particularly complex.

It should also be noted that many of the conditions are redundant with the mitigation measures.

Para 3: The mitigation measures and conditions of approval are legally binding on the applicant and the project. There are some components of the project that will be subject to additional review by the Town, such as design review, the tree removal permit, the grading permit, the building permit and the occupancy permit. Each of these components must be consistent with and implement the applicable mitigation measures and conditions of approval.

The comment is correct that in some instances language such as “to the extent feasible” is used. However, all 33 mitigation measures use the term “shall” in the main body of the measure and in most sub items. In six measures, the language “if feasible” or “to the extent feasible” is used for a component of a measure that is desirable but would not be necessary to reduce the impact to a less-than-significant level. Nonetheless, the applicant must demonstrate that these measures are not feasible if they are not to be implemented.

The comment does not explain why a Development Agreement would increase the likelihood that mitigation measures and conditions would be implemented. All of the mitigation measures and conditions are legally binding on the applicant, even if they are not fully implemented until a later time.

Para 4: Several reports used in the MND analysis were prepared by consultants under contract to the applicant. All of the reports were prepared by consultants qualified in their respective fields, and were reviewed by Town staff and the Town’s environmental consultants. The comment does not explain why it is not appropriate to rely on Town Codes, which are applicable to the proposed project, or what issues could “fall through the cracks”.

Item 2: The final MND is composed primarily of the Notice of Intent to adopt an MND and the Draft Initial Study, which was released on December 21, 2006, for public review. In response to comments received on the Draft Initial Study, several revisions have been made to the document (see Changes to the MND), but none of the revisions alter the conclusions of the MND that all impacts would be less than significant after mitigation.

Items 3 & 4: Conditions 3 and 4 are standard Town conditions. Condition 3 notes that the approval does not mean that anything shown on the plans that conflicts with Town codes is approved; Condition 4 defines that plans are being approved with date and title.

Item 11: Item 11 addresses the thickness of asphalt for the parking area, which will be the same in either the Phase 1 or Phase 2 area. The FEMA map revision (CLOMR) is not required for Phase 1, because Phase 1 is not in the floodplain. However, the applicant must demonstrate that drainage facilities can accommodate increased runoff from the entire project site prior to any grading. Therefore, the project will not exacerbate flood conditions.

Items 26 & 27: The comment does not indicate how these items would adversely affect the commenter's property. Item 26 specifically prohibits the applicant from constructing any fence or wall that would interfere with the offsite drainage channel. Item 27 simply requires that any wall design be reviewed and approved by a registered civil engineer. Although the condition refers to a fence, the proposed project will be constructing a 20-foot storage shed that will serve as a sound barrier, and which will exceed the effectiveness of the 12-foot wall requested by the commenter. No 6-foot chain link fence is proposed.

Item 48: This item is a restatement of Mitigation Measure 8, which would reduce the project contribution to cumulative air quality impacts to a less-than-significant level. Code Section 13.30.90.6.J addresses odor, which is not the subject of Item 48. Nonetheless, it should be noted that the project must comply with this condition, which prohibits emission of noxious odors or fumes.

Items 59 & 60: All of the onsite wetlands have been delineated and verified by the US Army Corps of Engineers. The verified wetlands delineation takes into account areas of past disturbance.

Item 62: Condition 62 is a standard Town condition. At the time of Planning Commission approvals, not every detail of a project is or can be known. Therefore, this condition allows the staff, in context of the Commission approval and Town policies, to allow for minor modifications. Section 13.64.070 of the Zoning Ordinance further sets out this process.

Item 63: The use of the term "if" is conditional and is binding. That is, the conditional use permit can only become effective if the Town Council approves the proposed change to the General Commercial zone to allow assembly. This condition is necessary because the Planning Commission is responsible for approving or denying the Conditional Use Permit, but the Town Council must approve the change to the zoning ordinance. If the Town Council does not approve the change to the zoning ordinance, the Conditional Use Permit would not be valid.

Item 66: All of the reports were reviewed by Town staff and the Town's environmental consultant. Even if there were marginal errors in the analysis, the project must comply with Town standards for noise. The Mitigation Monitoring Program (as well as conditions) requires that monitoring of noise levels occur after the project is constructed and under operation. If the project is shown to violate the noise standards, then additional noise attenuation measures and/or changes to project operations would be required.

Item 67: The \$500 deposit is an ongoing deposit; in other words, when the Town spends the \$500 on mitigation monitoring, the owner must re-supply the \$500. The Town has used this condition previously.

Item 78: The construction hours cited in the item are identical to those required by Mitigation Measure 28 in the MND. The MND does not restrict hours for business activity. To the contrary, recognizing that activity could occur into the evening and in the early mornings, the MND provides mitigation for activities that occur after normal business hours.

Item 79: Mitigation Measure 2 and Item 79 both provide strict standards for project lighting, so that adjacent residences are not subject to spill over light.

Item 87: The project site must be visible from Sierra College Boulevard, and the Town will periodically monitor the placement of materials in the flood fringe area to ensure that items are either elevated or moved out of the flood fringe during rainy periods.

Item 99: The Proposed Project has been redesigned to provide more parking. For Phase 1, 47 spaces will be provided, along with 15 overflow spaces in the loading area. For the full project, there will be 82 spaces, which will exceed the Zoning Ordinance requirements, and provide more than enough parking for employees and customers during both Phase 1 and the complete project.

With respect to design review, the applicant has chosen to break up the required applications for the project. Town codes do not require that it be applied for simultaneously; although it is often assists greatly with the understanding of the full project. In the conditions, for the benefit of the applicant and public, staff has listed the items that need to be reviewed within the design review application- and that are therefore still subject to conditions, and approvals or denials. Until the design is approved (as well as other approvals), the project cannot receive a building permit.

Raymond L. and Sylvia Epperly - (18)

The commenters' opposition to project is noted.

Placer County Water Agency

Business Center: 144 Ferguson Rd. • Mail: P.O. Box 6570 • Auburn, California 95604-6570
(530) 823-4850 800-464-0030 www.pcwa.net



A Public Agency

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January 2, 2007
File No. WA/Loomis

RECEIVED

JAN - 4 2007

TOWN OF LOOMIS

Kathy Kerdus, Planning Director
Loomis Planning Department
6140 Horseshoe Bar Road
Loomis, CA 95650

SUBJECT: Homewood Lumber Relocation Project
(APN 044-123-057 and 069)

Dear Ms. Kerdus:

Thank you for the opportunity to review and comment on the Homewood Lumber Relocation Project. Placer County Water Agency (PCWA) has reviewed the information and has the following comments.

Potable water can be made available to the project from the Agency's treated water main in Brace Road. A hydraulic analysis should be conducted to determine if there is adequate flow for fire protection purposes. Off site pipelines or other facility improvements may be needed to supply water for domestic or fire protection purposes.

In order to obtain service, the developer will have to enter into a facilities agreement with the Agency to provide any on site or off site pipelines or other facilities if they are needed to supply water for domestic or fire protection purposes and pay all fees and charges required by the Agency, including the Water Connection Charges. The Agency does not reserve water for prospective customers and this letter in no way confers any right or entitlement to receive water service in the future. The Agency makes commitments for service only upon execution of a facilities agreement and the payment of all fees and charges required by the Agency. All water availability is subject to the limitations described above and the prior use by existing customers.

Thank you for the opportunity to comment. If you have any questions please call me at (530) 823-4886.

Sincerely,

Heather Trejo
Environmental Specialist

HT:ly

Pc: Mike Nichol
Customer Service
Ross Hooper
Darin Reintjes
z:\EngFiles\WA\044-123.057, 069.doc

Ed Horton

From: Bob Richardson [richardson@loomisfire.org]
Sent: Monday, January 22, 2007 4:52 PM
To: Ed Horton
Subject: FIRE FLOWS
Attachments: 4025HunterOaksLn.doc; 5974BraceRoad.doc

ED,

HERE YOU ARE, PLEASE NOTE THAT THE FLOWS ARE ALONG BRACE AND ALSO IN HUNTER OAK SUBDIVISION... HAVE FUN.

RESPECTFULLY,

BUTCHER BOB

1/22/2007

**LOOMIS FIRE PROTECTION DISTRICT
HYDRANT FLOW INFORMATION SHEET
FLOW YEAR 2005**

File / System I.D.	PCWA / HUNTER OAKS		
Test Location	4021 Hunter Oaks Lane		
Remarks			
Tested By	B. Richardson, D. Jones, D. Fuller, D. Justus		
Date of Test	7/27/2005	Time of Test	17:45 Hrs
Static Pressure	115	Residual Pressure	92
Outlet Diameter	2.5	Total Flow	4774

FLOW HYDRANTS:

Hydrant ID / Location	Discharge Outlet Size	Coefficient	Pitot Reading	Total GPM Flow
5501 Mallard Ct.	2.5	.9	85	1547
5420 Brace Road	2.5	.9	88	1574
5695 Stone Road	2.5	.9	75	1453

Total Flow @ 20 PSI

9847 gpm

**LOOMIS FIRE PROTECTION DISTRICT
HYDRANT FLOW INFORMATION SHEET
FLOW YEAR 2005**

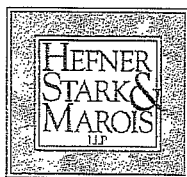
File / System I.D.	PCWA / BRACE ROAD		
Test Location	5974 Brace Road		
Remarks			
Tested By	R. Richardson, A. Portillo, J. O'leary		
Date of Test	11/12/2005	Time of Test	16:15
Static Pressure	129	Residual Pressure	118
Outlet Diameter	2.5	Total Flow	2978

FLOW HYDRANTS:

Hydrant ID / Location	Discharge Outlet Size	Coefficient	Pitot Reading	Total GPM Flow
5695 Stone Road	2.5	.90	100	1678
6188 Brace Road	2.5	.90	60	1300

Total Flow @ 20 PSI

10,288 gpm



LAW OFFICES
ESTABLISHED 1896

TIMOTHY D. TARON
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2150 RIVER PLAZA DRIVE
SUITE 450
SACRAMENTO, CA
95833-4136
TEL: (916) 925-6620
FAX: (916) 925-1127

January 18, 2007

Kathy Kerdus
Planning Director
Town of Loomis
6140 Horseshoe Bar Road
Loomis, CA 95650

**Re: Homewood Lumber Relocation Project-Comment to the Proposed Mitigated
Negative Declaration**

Dear Ms. Kerdus:

Our firm represents Rocklin Crossings, LLC (Donahue Schriber), owner and developer of the proposed Rocklin Crossings project in the City of Rocklin. In the course of our ongoing discussions with the Placer County Water Agency (PCWA) we have become aware of their recently submitted comments on the Homewood Lumber relocation project concerning potential impacts to potable and fire water supply. PCWA submitted similar comments during the environmental review of the Rocklin Crossings project, as both proposed projects are located in the geographic area and are served by the same water supply network. Portions of the system serving both sites are located within the Town of Loomis and portions are located in the City of Rocklin. Both letters requested that the applicant conduct a hydraulic analysis to determine the likely impact on PCWA facilities.

In response to the comment received for the Rocklin Crossings project, we have completed the recommended hydraulic analysis. Preliminary results of this analysis reveal that both Rocklin Crossings and the Homewood Lumber relocation will have measurable impacts on the operation of PCWA's system. We understand PCWA to believe that off-site upgrades to the existing improvements will be required to provide adequate pressure for either or both of the proposed developments in the instance of a fire event. Our preliminary analysis suggests the available solutions are quite expensive and will require improvements in both jurisdictions.

Our client believes the best solution to this issue is for all parties to work together to arrange an acceptable funding mechanism and timely improvement plan so as to remove this single impediment from the path of both projects. To that end, Rocklin Crossings has contacted PCWA about the formation of an appropriate vehicle to fund the improvements and reimburse the parties that provide the upfront dollars to improve the system as other development that will

Kathy Kerdus
January 18, 2007
Page 2

benefit occurs. We believe these offsite improvements should be considered as the Town considers Homewood Lumber's application, and we would ask that the Town condition the project to require the water system improvements be in place prior to opening. Rocklin Crossings looks forward to working cooperatively with Loomis and Homewood to address PCWA's concerns in a timely and cost effective fashion.

Please contact the undersigned or my client's project manager, Mark Perlberger (916-920-8272) so as to permit us to discuss this matter with you in greater detail.

Thank you for the opportunity to comment on this important matter.

Very truly yours,

HEFNER, STARK & MAROIS, LLP

By

Timothy D. Taron

Cc: J. Petersen
D. Mossman
C. Urrutia
B. Martin
M. Perlberger

TDT:seg

K:\Donahue Schriber\Rocklin Crossings (4888-0005)\lt kerdus 1.doc

MIWOK
MAIDU

United Auburn Indian Community
of the Auburn Rancheria

JESSICA TAVARES
CHAIRPERSON

JULIE HUFF
VICE CHAIR

DAVID KEYSER
SECRETARY

DOLLY SUEHEAD
TREASURER

GENE WHITEHOUSE
COUNCIL MEMBER

January 19, 2007

Town of Loomis
Planning Department
Kathy Kerdus, Planning Director
6140 Horseshoe Bar Road, Suite K
Loomis, CA 95650

RECEIVED

JAN 30 2007

TOWN OF LOOMIS

Subject: Draft Initial Study and Mitigated Negative Declaration for the Homewood
Lumber Relocation Project

Dear Ms. Kerdus:

Thank you for providing a copy of the above referenced document. The United Auburn Indian Community (UAIC) is comprised of Miwok and Maidu people whose traditional homelands include Placer and Nevada Counties, as well as some surrounding areas. The Tribe is concerned about development projects in ancestral territory that have potential to impact culturally important sites and landscapes. We appreciate the opportunity to comment on the proposed project.

Based on the information contained in the CEQA Initial Study/Proposed Mitigated Negative Declaration, the UAIC understands that no prehistoric cultural resources have been observed within the study area, nor were any identified as part of the record search process. However, the Tribe would like to express concern regarding the possibility for discovery of previously unidentified cultural resources and/or subsurface remains, particularly in the case of ground disturbing activities such as those proposed.

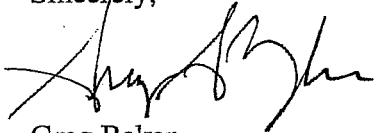
An inadvertent discovery could potentially have a significant effect on cultural resources, including possible human remains. We concur with the Town of Loomis' decision to consider a "Mitigated Negative Declaration" as the appropriate level of analysis for the proposed project. To supplement your proposed mitigation measures, we suggest that the following language be added to the CEQA document to ensure proper consideration of potential effects to Tribal cultural resources during project implementation:

1. In the event that prehistoric archaeological resources are discovered during ground disturbing activities, all work in the vicinity of the find shall be halted and the UAIC should also be contacted immediately. If the find is determined to be legally significant by a qualified archaeologist, or culturally important to the Tribal community, project representatives shall meet with the archaeologist and the Tribe to determine the appropriate course of action.

2. If human remains are discovered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the coroner determines that the remains are of Native American origin, the coroner will notify the Native American Heritage Commission, which will notify a Most Likely Descendant (MLD). The MLD shall be responsible for recommending the appropriate disposition of the remains and any grave goods at that time.

We would like to thank you in advance for taking these matters into consideration, and for involving the UAIC in the planning process as early as possible. We look forward to receiving the final environmental report upon its completion. Please contact Shelley McGinnis, Analytical Environmental Services at (916) 447-3479 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Baker', is written over a horizontal line.

Greg Baker
Tribal Administrator

CC: Shelly McGinnis, AES



**PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT**

Ken Grehm, Executive Director
Brian Keating, District Engineer
Andrew Darrow, Development Coordinator

January 22, 2007

Kathy Kerdus, Planning Director
Town of Loomis
6140 Horseshoe Bar Road, Suite K
Loomis, CA 95650

RE: Homewood Lumber / Draft Initial Study

Kathy:

We have review both the Draft Initial Study and Mitigated Negative Declaration for the subject project and have the following comments.

1. This project is located within the Dry Creek Watershed near the Loomis Tributary. A general assessment of flooding in this watershed is provided in the "Dry Creek Watershed Flood Control Plan" report by James M. Montgomery Engineers (JMM) dated April 1992. According to Figure 5-2 (JMM, 1992), onsite stormwater mitigation is recommended for this project.
2. As a mitigation measure, we request that the applicant be required to submit a preliminary drainage report in conformance with the Placer County Stormwater Management Manual. This report should determine the stormwater runoff impacts downstream and include, if necessary, an analysis of a proposed onsite stormwater detention facility.
3. If the applicant is proposing to place a significant amount of fill within the 100-year floodplain limits, then the District requests that a hydraulic analysis of the Loomis Tributary be performed in order to determine if there are any impacts to floodplain limits on neighboring properties.

Please call me at (530) 745-7541 if there are any questions regarding these comments.

A handwritten signature in dark ink, appearing to read "Andrew Darrow".

Andrew Darrow, P.E.
Development Coordinator

d:\data\let\lram07-18.doc

Concerns regarding the Homewood Lumber Relocation Project

1. Noise:

The proposed location is adjacent to numerous residences. The noise of operating a lumber yard and fabrication business in such close proximity to these residences will degrade the quality of life of the already established Loomis residents in the area.

2. Traffic:

Traffic congestion on Sierra College Blvd. between I-80 and Taylor Rd is already serious problem. It is even mentioned in the General Plan under "Constraints and Issues facing the Town of Loomis". Adding large delivery vehicles and additional customer traffic to that area will push an already overloaded infrastructure to its absolute limits if not the breaking point.

3. Safety:

There are a large number of children in the surrounding area who walk and ride bicycles along that road. Their safety was a major force in the addition of the new stop sign at Brace Rd and Howard Ln. The addition of a lumber yard and fabrication business in the immediate area will further put our children at risk with all the increased traffic and heavy equipment being operated.

4. Visual Esthetics:

All the residents in the area have made a choice to reside in Loomis. One of the major influences in that decision is the beautiful scenery of sprawling hills, open spaces, and woodland oaks. These are also some of the core values outlined in the Town of Loomis's General Plan. By locating this project here, we would be replacing one of the very reason's we moved into this area with 39,000 square feet of industrial buildings. This is in direct contrast to the town's General Plan as outlined by the Loomis Town Council.

5. Zoning:

The proposed development site is currently zoned as General Commercial. General Commercial, as defined in the General Plan, is "intended mainly for retail and service commercial uses located outside of the downtown core, that primarily serves local residents and businesses." The current location of Homewood Lumber is zoned as Light Industry. Light Industry, as defined in the General Plan, is "intended for the manufacturing, production, storage, or sale of consumer goods and services, and for heavy commercial uses that involve outdoor activity or storage areas." It would appear that the General Commercial zone is not entirely appropriate for this type of business and that it is in fact better suited in the Light Industry zone.

/Scott Bradley
4008 Hunters Dr.
Loomis, CA. 95650
916-652-4298

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JAN 22 2007

TOWN OF LOOMIS

RECEIVED

JAN 22 2007

Norbert J. Perduta
5441 Brace Road
Loomis, CA 95650

TOWN OF LOOMIS

January 22 2007

Town of Loomis
Planning Commission

Homewood Lumber Project

I do not feel this is the proper type of business for this location. Homewood Lumber should be located in a light industrial location, with others of the building and trade supply Companies. At a location that will cause the least interference, with traffic, and private residences.

The Homewood Project would cause both, traffic problems and noise pollution for both the apartments, and the private homes in the vicinity. As of now two entrances will be used but, on Page 68, of the project booklet it states, in the event of traffic conflict at the Sierra College Entrance and exit, it may be done away with. This would cause all traffic to use Brace Road alone, which will lead to traffic problems on the roadway and the Sierra College Intersection.

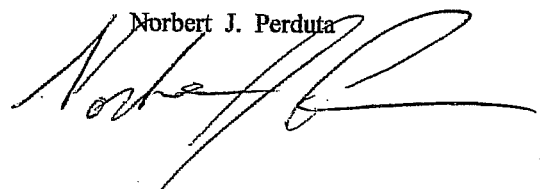
Concerning noise levels, and work hours, page 11 of the booklet states the swing shift Would continue it's work until it is complete. This tells me work hours at Homewood may be close to 24 hours a day. I do not feel the residents of the area should be subjected to this. The town of Loomis should try to find a commercial enterprise which, would not cause these concerns.

Concerning flooding problems in this area, drainage is a problem and should be Addressed before any type building is allowed. If Homewood is allowed to proceed, and problems become more severe, who will end up paying to correct this problem? I do not believe this burden should end up on the shoulders, of the homeowners and apartment dwellers on Brace Road.

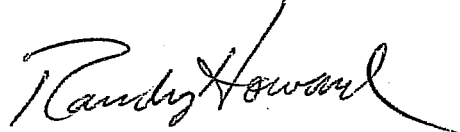
I also believe property values will go down for many of the property owners in this Neighborhood. How will this problem be addressed, if it were to happen?

Sincerely

Norbert J. Perduta



To the Loomis Planning Commission; Re. Homewood Lumber's new location at Brace Rd. and Sierra College Blvd. I do not believe this is a proper location for this type of business. This area has always been strictly residential. I could understand some light commercial business, such as a mini-mart or small strip mall, but to me, this is somewhat light to heavy industrial. This type of business just doesn't belong in this area. This shows no regard for the longtime residents of Loomis. I myself am a third generation resident of Loomis. My Dad was on the first city council and he would be very upset to see this happening to the place he called home for all of his life. I thought the main concept behind incorporation in Loomis was to preserve our rural lifestyle. Having a lumber business in our neighborhood just doesn't seem very neighborly. Please take into account the feelings of all the people living in the affected area before approving this project. Concerned lifelong resident, Randy Howard 3980 Howard Lane



1-22-07

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JAN 22 2007

Kai Krienke
5397 Brace Road
Loomis, CA 95650

January 22, 2007

TOWN OF LOOMIS

Kathy Kerdus, Planning Director
Town of Loomis
6140 Horseshoe Bar Rd, Suite K
Loomis, CA 95650

Re: Draft Study and Notice of Intent to Adopt a Mitigated Negative Declaration for the Homewood
Lumber Relocation Project

Dear Kathy,

I'm again writing regarding the Homewood Relocation Project, primarily respective of the most recent report for titled "Draft Study and Notice of Intent to Adopt a Mitigated Negative Declaration" (MND).

I'm sorry to have come late to the January 20th onsite meeting. As in other onsite meetings, my indication was that this meeting was somewhat informal and would be lasting until 11:00am. However, I was able to discuss certain things with Hamid and Ryan and, together with my own walk-through, I believe it was informative for myself and other involved people to meet. I would like to caution you and the council members as to the NOT-TO-SCALE aspect of the portrayed building layout(s), driveway ingress and egress locations, and floodplain demarcation(s). As I measured to confirm certain setbacks, it became clear that the ribbon lines portrayed were inaccurate. Hamid later confirmed with me that although the attempt was made, the markings are not accurate to scale. I suggest that you and the council members please refrain from any conclusion(s) you may have drawn respective of this un-scaled representation of Homewood's Proposed Relocation plan.

I continue to find it interesting that the premise of this project seems to favor Homewood while minimizing the impact to the local residential community. A Town wide zoning change is required to specifically benefit Homewood and yet be a disservice to nearby residents. And while I respect that the Town wishes to favor Homewood because they are "one of the top sales tax generators", I am more concerned with the Town blinding itself to the numerous oversights in the project scope and operations vs. the negative impact to the local residential community.

The local residents are not even mentioned in their proximity to the project in Chapter II Project Location, rather there is a minimal mention under Existing Conditions. Also under Existing Conditions there is an initial reference to adequate acreage, while it is clear that less than half the area is available for project development. Although the acreage is then defined as to use and non-use, Homewood's current operation utilizes almost twice the acreage than what is available for the initial phase of development. Simply check an aerial photo and a clear inconsistency will be presented in opposition to the MND's report that Homewood will be utilizing the near the same acreage as it currently uses. The MND report is clear to mention that the entire 5 acre operation will be relocated, yet the MND inconsistently discusses the initial improvement of "phase 1" to be 3 acres followed by improvement of "phase 2". And if the phase 2 improvement is somehow modified or disallowed (being in a floodplain), THEN WHAT?

In chapter 2, Existing Conditions "CG Zone", there is mention of changing the "zoning ordinance to allow for assembly of pre-made goods". The zoning change is being described as needed for, and confined to, assembly only and not manufacturing. Apparently the MND is trying to draw a distinction between the key words of "assembly", and not "manufacture". There is also an indication to somehow attempt to separate the word "pre-made" materials from "raw" materials when the town code currently includes the phrase already processed raw materials. This certainly indicates that pre-made materials are already intentionally set apart from raw materials in the language incorporated in the Town's ordinance Section 13.80.020.

56 Manufacturing and **assembly** are already well covered in one of three categories of included within the
57 Town code. Homewood favorably fits into the category of "manufacturing/processing-light" per Section
58 13.80.020 code language; "Light manufacturing also includes other establishments engaged in the
59 assembly, fabrication, and conversion of already processed raw materials into products, where the
60 operational character aspects of the manufacturing processes and the materials used are unlikely to
61 cause significant impacts on surrounding land uses". This definition clearly governs assembly operations
62 apart from manufacture. **The Town code is already is specific and defines the zoning of**
63 **Homewood's operation to fit within an ILT zoned district.** Additionally, in the "variety of commercial
64 land uses" cited in the MND, not one existing business is cited to perform approved "assembly" work
65 during late night or in the early morning hours, as proposed by Homewood. And I am unaware of any
66 building industry "assembly" operation that does not require some form of "manufacture". Regardless and
67 in reality, Homewood has a vibrant manufacturing facility and their ability to fit into the existing community
68 should be recognized as such.
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70 The definition of the proposed new category of "Assembly of building components" states that this "would
71 apply to assembly, fabrication, and conversion of already manufactured building components where the
72 characteristics of the assembly process are unlikely to cause significant impacts on the surrounding land
73 uses or the community". In an effort to parse words, the Town is willing to draw a distinction between "pre-
74 made" vs. "already processed" and "building component" vs. "already processed". This is a matter of
75 semantics as there is a fine line between what may be considered "pre-made" vs. a "building component"
76 vs. what is an "already processed raw material". In product assembly all materials used are considered
77 interchangeably as both a "raw material" and a "building component" material in order to produce some
78 other "raw material" or "building component" material for yet another purpose down the line in
79 "manufacturing".
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81 It is a simple matter of semantics for the Town to adopt the new category language of "Assembly of
82 building components" when we already have the same activity approved in the category of
83 "Manufacturing/processing – light". It seems an interestingly convenient attempt for the Town to revise a
84 Town zoning ordinance for the benefit of one business to the exclusion of the Town's applicable existing
85 ordinance(s) and thereby cause an undo burden to the nearby residents.
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87 There is mention of 1500 cubic yards of stock piled fill dirt. Why? In one statement there is mention of the
88 need to export dirt, and in the same paragraph there is mention to backfill the "lowest elevation". This is
89 indicative of the obfuscation generated by a project which is working a very narrow margin within the
90 floodplain fringe. This MND language is also indicative of a developer trying to save time and money by
91 not fully developing a plan. Because I am directly affected by the "Phase 2" work inside the floodplain, I
92 remain unsatisfied with the lack of hydrology engineering as this affects all upstream properties. Phase 2
93 will also affect the current wetlands area and destroy a pervious water surface. There is mention of
94 storage within Phase 2; who will enforce the compliance that all storage is lifted to above floodplain
95 and/or removed during heavy water flow?
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97 The MND omits the already backfilled and proposed improvement within the floodplain fringe along an
98 area near the southwest corner of the proposed property at the corner of Sierra College & Brace Road in
99 "phase 1". The original grading plan for this project reflected the need to improve approximately an
100 approximate three-quarter acre area with in the original floodplain fringe. The current map alludes to no
101 improvement of this ¾ acre. It instead covers it up by redefining the "FEMA Q-100 Flood Fringe" line and
102 creates ambiguity by also using the term "Location of 100 Year Fringe (post construction)". The MND
103 description of the floodplain extent and use, whether by error or omission, does not speak to or reflect the
104 fact this was an existing condition and, in turn, does not address how the properties upstream are now
105 impacted by the unapproved backfilling of this approximate ¾ acre area. Some explanation may lie in the
106 earlier question of what is to become of over 1500 cubic yards of approved stock piled fill dirt as
107 mentioned in page 2 of the MND.

The Town originally approved Homewood to "store" dirt on this property at the southwest corner of Sierra College & Brace Road. The Town's practice of approving the "storage" of fill dirt without any pretense of need continues to be an un-answered question; What will happen & Who is responsible should the grading of "stored fill" be ultimately unapproved by the Town? Homewood (and the Town) have a vested interest to minimize their profile of this property to the existing community. Whether by error or omission, the MND report fails to address the history of complaints addressing the unapproved grading that has already taken place within the original floodplain fringe area. Unapproved grading within this area of floodplain fringe has been chronicled in my complaint of 9/02/06 and elaborated in my letter to the Town on 9/05/06. Whatever the Town chooses to do respective of this issue, it again exposes the marginal nature of Homewood's operation physically fitting within the improvement area of this property, **over half of which is located within the floodplain**. Homewood's current operation will only fit very narrowly (some, as do I, consider not at all as planned) and the "powers that be" seem to be somewhat desperate to not address this issue of grading an unapproved ¾ acre.

I wish to lodge an advance complaint regarding the "phase 2" backfilling within the floodplain. The owner(s) of this property have a vested interest in wanting to utilize the land and bring it out of the floodplain. Left un-checked, over time (years?), and incrementally, the most cost effective and low profile means to do that will be to BACKFILL.

The unapproved grading that has already occurred on the three-quarter acre floodplain fringe area unmentioned in the MND report must have some impact, even if negligible, to the floodplain and consequently to the properties upstream. More than a minor issue, this unapproved and unmentioned grading also is indicative of a level of disdain for the lawful process or a desperate act to gain more usable land for a project that is of question as to its ability to fit within what land is legally available to develop. This unapproved area of grading is located within "phase 1" and, in my opinion, serves as consideration to halt any development proceedings until grading approval is granted upon the review of the impact of this unapproved grading.

Additionally, "phase 2" will be constructed within the floodplain fringe and seems to be a foregone conclusion that it will have little or no impact. For numerous reasons already raised I question decision(s) to approve this. In the MND report the Town seems willing to allow the building of a paved yard and parking without mention of consequence. The MND report makes mention of "backgrading 2 +/- feet from the lowest elevation". The fact that there is no further mention of mitigating the floodplain except in Mitigation #26, with respect to FEMA, is unacceptable. This seems to be a continuing attempt indicative of a level of disdain for the lawful process to conduct a hydrology impact report for the benefit of the community. Any building within the floodplain, regardless of construction type, will affect upstream properties. Building in "phase 2" will also impact a wetlands area. I am unsatisfied that my upstream property will be unaffected until the "phase 2" building area is legally mitigated.

Zoning Compliance:

While I respect the interest of the Town to accommodate a large employer, I disagree with the methods being employed to retain Homewood on this site to the exclusion of the Town's own business codes(s). I have lived here long enough to witness the Town of Loomis gradually veering away from the Town's doctrine of maintaining a rural community atmosphere. This is further evidenced by code 13.26.020 (B) stipulating that *"The CG zoning district is applied to areas appropriate for a range of retail and service land uses that primarily serve local residences and businesses."* Homewood's operation is large and, with exception of generating local taxes, they do not serve *"primarily local interests"*. Homewood has outgrown this directive and is charting new ground for the Town and its best interests. Homewood now serves a more regional Sacramento Area and many of their employees come from the surrounding communities, thereby NOT serving primarily local interests.

In addition, Homewood is being misclassified to fit a General Commercial zoning when it is more appropriate to Limited Industrial zoning. Section 13.28.020(B) has no such directive of the ILT zone to "primarily serve local residences and businesses." Why present to an existing, Town compliant, residential community the annoyance of an untried, marginally fitted, business operation when many other business types will easily fit into this Brace Road neighborhood?

Please review (figures 1-6) below the comparative zoning categories of the Town development standards as listed in Title 13, Chapters 26 & 28, Table 2-6 & 2-9 and defined in Section 13.80.020:

Figure 1

Permit Type Required by Zone Tables		MND's Description (p.12) of Homewood's Operational Use as "generally consistent"
GC (2-6)	ILT (2-9)	
P	P	Building/landscape materials sales - Indoor
MUP	MUP	Building/landscape materials sales - Outdoor
Homewood falls easily into these categories of Table 2-6 of Section 13.26.040 of the Zoning Ordinance. Comparatively, they also easily fall within the ILT zoning Table 2-9, in which their current operation exists without any margin of residential issues.		

Page 12 of the MND describes Homewood's Project as generally consistent with the above listed categories. Below is a list of a more expanded view of a full service lumber yard and building materials supplier, which also applies to Homewood and are eluded to on page 12 of the MND as "categories (that) do not fully describe (Homewood's) activities".

Figure 2

Permit Type Required by Zone Tables		MND's <u>Un-Described</u> Use of Homewood's Operation that are "un-reviewed"
GC (2-6)	ILT (2-9)	
Not listed	MUP(3*)	Storage – Outdoor (3* - "outdoor activities to be compatible with residential")
Not Allowed	MUP	Building/landscape materials sales – Outdoor 15,000 sf maximum
Described in the MND, there is over 30,000 sf. total outside area planned to be used for business activities, regardless of an omission to reflect an area for vehicle storage per Section 13.80.020. While Homewood's plan uses the semantics of "Covered Lumber Storage" and/or "Lumber Inventory", it is clear that the space required for the true nature of the business of SELLING lumber, whether sales or storage, again emphasizes that Homewood's operation will be better suited to an ILT zoned district.		

Logically defined "Storage—outdoor" per Section 13.80.020 of the Loomis Town Code stipulates this as an appropriate definition of Homewood's "lumber inventory" area. And by default, "Building/landscape materials sales – Outdoor 15,000 sf maximum" is then disallowed to occupy a CG zoned district.

The MND description of the outdoor activities required to support Homewood's operation is semantically questionable. Outside "Storage" or "Inventory" is a poor indication of the full scope of business activities and, in my opinion, once again, requires a clarification of Homewood's true scope and nature of operations. In any case, this is another indication of Homewood, et al attempting to relocate a major business concern to an area marginally able to support them while using vague terms so as to confuse the ability to be defined by Section 13.80.020. Because the MND has not mitigated these items, I again believe that the overall mitigation measures do not make community impacts "less than significant".

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Figure 3

Permit Type Required by Zone Tables		MND's Un-Described Use of Homewood's Operation that are "not fully defined, (p.12)"
GC (2-6)	ILT (2-9)	
Not listed	MUP(3*)	Furniture and fixtures manufacturing, cabinet shop (<i>door shop, and sawyer services similar**</i>) (3* - "outdoor activities to be compatible with residential")
As defined by Section 13.80.020 This (along with the below permit comparison) is the most appropriate current category for Homewood's door AND sawyer AND related processing operations. (** A review of the tools required on page 11 will support this similarity.)		
Not listed	Not Allowed	Manufacturing/processing - intensive (<i>door shop, and sawyer services similar**</i>) (3* - "outdoor activities to be compatible with residential")
This category (along with the above cabinet shop description) best describes within a large safety margin, per Section 13.80.020, Homewood's operation as rounded out by their Retail Operation. As shown, their overall business activity is better mitigated as an ILT zoned operation.		
Not listed	MUP	Manufacturing/processing - light
This category is the most favorable in describing the Homewood operation within an acceptable safety margin. The Town code here is more appropriate to Homewood as an "establishment engaged in the <i>assembly, fabrication, and conversion of already processed raw materials into products</i> ". The term "already processed" as defined per Section 13.80.020, reflects the intent of the existing ordinance to allow "pre-made" or "building component" goods in the assembly operation of Homewood. There should be no reason to create a new zoning ordinance for a single benefactor. This comparison again reflects Homewood being an ILT zoned operation. (See additional explanation on page 1)		

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There is no reference in the MND as to the above (figure 3) classifications for Homewood, even though there is some obvious relevant mention within Section 13.80.020. Upon review of the Town's Codes it becomes clear that Homewood is not fully able to be classified in to a few of the Town's currently defined business activities. This indicates that the Town is obligated to better define the true nature and scope of Homewood's activities, especially when their activities first, push the envelope of what multi-use businesses are defined in the Town of Loomis Codes, and second, don't answer how an unknown scope of a not fully defined multi-use business will affect and impact an abutting residential community.

The below (figure 4) is an attempt by the Town to address the MND's "not fully defined" Homewood activities by adding a town wide amendment to benefit Homewood's Relocation Project. In my understanding, I would expect it an easier and a less protested action to consider modifying the language of an existing more appropriate category (figure 3) associated with Homewood's activities.

Figure 4

Permit Type Required by Zone Tables		MND's Description (p.13) of Homewood's Operational Use that requires "Revision of the Zoning Ordinance"
GC (2-6)	ILT (2-9)	
MUP	Not Mentioned	Assembly of building components
The MND defines this category as "assembly, fabrication and conversion of already manufactured components" in an attempt to semantically separate it from and, in an effort to, de-emphasize the manufacturing aspect of Homewood's activities. Semantically speaking this is a defined attempt to differentiate it from the Section 13.80.020 definition in "Manufacture/processing-light" (figure 3) and allow some certain limited manufacturing to occur without penalty. This marginal consideration of terms further decies the need to better define Homewood's nature and scope of business activity. (See additional explanation on page 1)		

The need to make a formal effort to change a Zoning Ordinance to benefit a single business is disconcerting for more than a couple of reasons. There is no asterisk or subscript to offer any support to abutting residential communities. It appears that this new category is hastily considered and will not be allowed in the more suitable ILT zone, which seems to push aside the Towns theme of "Who We Are" in gravitating towards the best interests of it's residents and *"retaining our rural character and charm"*. The semantics in the MND describe this new category as "unlikely to cause significant impacts on the surrounding community" when the true scope of operations, regardless of benefiting a single door shop manufacturer, will produce added trucking and potential outside processing noise. Additionally, these and other questions are not being given the fair right of Town discussion and due process a new amendment deserves.

The Town's interest to simplify and minimize the incongruity created by Homewood's multi-faceted operation by amending Title 13.26, Table 2-6 under "Retail Trade", falls short of assessing the very real impact on an existing residential community. Homewood's "assembly operation", as well as some of their other operations are a nuisance to any residential community, and are better protected under Table 2-9 within an ILT zoning district. If there is an interest by the Town to begin amending the town code(s) for Homewood, perhaps the town would be better off to rezone Homewood's land and minimize certain mitigation issues.

Below (figure 5) are other ancillary operations associated with a large multi-faceted building materials sales business. All these activities are either typical and/or negligible when being considered of a small business. As a large business, these activities add to the already marginal aspect of Homewood's primary interest to call itself a "retail operation" in order to fit the proposed location. The below activities are also considered in the MND on page 12 as "categories (that) do not fully describe (Homewood's) activities that could occur".

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Figure 5

Permit Type Required by Zone Tables		MND's <u>Un-Described</u> Use of Homewood's Operation that are "not fully defined, (p.12)"
GC (2-6)	ILT (2-9)	
Not listed	Not Allowed	Recycling –Scrap
Section 13.80.020 describes this as a primary business activity. I've included this because a large part of the lumber business generates a lot of recyclable materials. The amount of service required to dispose of Homewood's refuse adds trips and trucks beyond the "normal" for what would be generated for an unmitigated CG zoned business.		
Not listed	P	Storage-Warehouse, indoor storage
Not listed	P	Wholesaling and Distribution
P	P	Office – Accessory
P	P	Office-supporting retail
Not listed	P	Accessory service uses
Homewood's operation, by its nature, encourages many and varied vendor types. Their amount of outside vendor service will require additional trips and trucks beyond the "normal" for what would be generated for an unmitigated CG zoned business.		
Not Allowed	Not listed	Warehouse retail
Though it may currently be a minimum, it would be naive to consider that there will not be some retail warehouse sales occurring with this size operation. And while this activity may be mitigated now, in consideration of Homewood's anticipated growth, Warehouse Retail will also grow.		
Undefined Potential Uses:		
?	?	Radio Communications
This issue was brought up at the 1/04/07 MND meeting. I found no definition in Section 13.80.020. Regardless of what mitigation measure may be proposed, there is concern for ongoing residential nuisance interruptions. This, again, would have little need for mitigation were Homewood located in an ILT zone.		

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I wish to call attention to the fact that Homewood's operation is much better suited to an ILT zoning due to the important consideration that some of the lesser incidental activities serve to better describe the intentional nature of operations in a full service lumber yard. Regardless of the above (figure 5) not being Homewood's primary categories, their business will be engaged with these activities, some more or less. It seems obvious that were Homewood seeking to relocate to an ILT zone there would be little to mitigate. As they work through the required mitigation for this proposed location, I believe, they should be more accommodating in modifying their ILT operation to fit more comfortably within the margins of a CG zoned operation AND an abutting residential community. The Town should additionally be more circumspect with respect to Homewood's anticipated growth, in that, currently there is no acceptable margin for expansion.

While the below (figure 6) is not listed as a category fitting an exact Homewood activity, there is a reference in the MND as to a similarity in Homewood's wanting to extend its operating hours. Table 2-6 makes reference to mitigating extended hours, where as Table 2-9 does not. Neither Table, nor Section 13.80.020 offers any explanation to this specific aspect of Homewood's operation in working nighttime hours near a residential area. I've included this category as a sample to discuss the concern of for limiting the working hours of a business abutting a residential neighborhood.

Figure 6

Permit Type Required by Zone Tables		MND's Described Use (p.11) of Homewood's Operation that is "un-reviewed"
GC (2-6)	ILT (2-6)	
MUP (4*)	Not listed	Extended hour retail (4* - "use not allowable when abutting residential")
It is clear that a business operating at extended hours can be mitigated, EXCEPT when abutting a residential neighborhood it is NOT ALLOWABLE.		

Although Homewood will not be operating its retail operation for extended hours, the late night and early morning working shifts will add measurably to the nuisance created by an ILT zoned business abutting a residential community. I find no explanation or definition under Section 13.80.020 to understand how Homewood's type of extended operating hours can be applied to an abutting residential neighborhood, regardless of the MND's interest to classify Homewood as a CG zoned business. I find an abundance of inferences within the code(s) language similar to the above (figure 6) where there is deference paid to the town residents by a business conducting operations next to a residential zone.

Section 13.26.020(B), Commercial Zoning District, seems to presume a CG zoned business will largely be friendly and able to mitigate most issues of an abutting residential zone, operating hours included. Because Homewood is more likely to fit an ILT zone, there is precedent in language per Section 13.28.020(B), and subsequent Section 13.28.060 limiting operating hours. Homewood is already located within an ILT zone and enjoys the benefits of either, already having an "extended hours" use permit, or of not being monitored for their current violation of this code. Whatever the case, Homewood's interest to operate their business outside of normal working hours would clearly be a nuisance as they operate next to a residential community. The Mitigation measures #27 & 28 are insufficient and rely on a self policing practice that Homewood has historically been unable to control.

While many of Homewood's business operations fit a CG zoning, more of their overall activities are not even considered as part of CG zoning. Most of Homewood's *intended* and primarily utilized operations are included within, and comfortably fit the list of categories of an ILT zoning district. Furthermore, as described above, some of Homewood's operations still require review to be mitigated in compliance with the Town code(s). Homewood's additional activities requiring mitigation will also more easily fit an ILT zoning as abutting a residential area. In other words, a permitted CG activity that doesn't fit in ILT will more easily be mitigated in ILT; as opposed to it being more difficult to take an approved ILT activity then adapting and mitigating it to fit into a CG zoning district.

For example; Title 13.28.060 restricts the hours of operation in an ILT district, except by permit, making mitigation a simple procedural matter. No such restriction is listed for a CG zone; yet it is clear that the intention of code language, in general and as shown above under "Extended Hour Retail" (figure 6), defers to the well being of the residents of the Town of Loomis. This, in turn, makes mitigation much more important because of the need to clarify a business' intention.

There remains a need to better clarify the current and future intentions of Homewood's activities and the extent of their operations. There remains an interest by the residential community to see how Homewood's relocation will benefit the community. As it appears, Homewood is unwilling to make any real adjustment(s) in their operation and promote themselves as a friendly neighbor, while the Town seems to be naive in not addressing the full scope of Homewood's operations.

Additional Operations:

Certain operational contradictions are contained within the MND report, from insufficient parking to playing semantics over terms listed in Section 13.80.020 and other Town Codes.

Under chapter 2, Operations Homewood's current site is listed as 5 acres, and later noted the new site as allowing "at least 2 acres of outside storage" and "at least 2 acres of yard space". Equaling over 4 acres and excluding the office and parking. Were this true, the acreage utilized from current to the site should be the same. I am forced to question the aerial maps reflecting Homewood trying to move a 5+ acre operation into an area initially about half the size. And while the MND downplays the acreage required, a cursory review of the tentative map reflects that Homewood is planning to develop over 6 acres between Phase 1 & 2.

While I can respect the fact that this may be possible in the absence of "phase 2" approval, what I consider unsatisfactory is the lack of planning respective of the consideration that scope of operations barely fits now and is not working on any margin of error for current relocation issues. More importantly, there allows for NO room to grow, except into the unmitigated floodplain. Yet the report acknowledges the prospect of Homewood's future growth.

The Environmental Noise Assessment report by j.c. brennan & assoc. reports the noise levels being at their maximum even after mitigation. It locates an approximate outside saw location which is not addressed by the MND as to it having a stationary location. This study is requires more attention using additional acoustical criteria. Only one sound receptor used was and placed at 5 feet above ground, when several should have been used along ALL property lines and at varying heights from 5 to 18 feet above ground.

The location of the truck loading/unloading activities, fork lift circulation and the use of a reciprocal saw is of critical concern to properly assessing the new noise impact to the residential community. The marginal nature of these noises and location will further necessitate the need to for Home to "self-police" and limit all operations in stationary areas. Due to the fact that the mitigated noise in the MND is at a maximum, any future modification to Homewood's logistical operation will result in changes in the noise you are now trying to mitigate. **The current mitigation is insufficient.** The MND report's mitigation of the trucking activities requires specific measures in an attempt to govern a private business which will require future enforcement when their business grows and expands. The MND report does not address the reciprocal saw noise except in Table 7, which is expressed in a manner that would best be interpreted by a lawyer. In actuality, the saw noise will be an ongoing, irregular, intermittent and monotonous noise nuisance to the residential community, regardless of what is considered an acceptable noise "dB". This again is a business activity not allowed by the Town code in a CG zone abutting a residential community. One mitigation planned is the covered lumber storage wall along the eastern property line. This wall has been represented to be of masonry construction, but the Environmental Noise Assessment report is not definitive in the type of wall construction except to say that it should be constructed of a "solid material". With only the description of wall construction as a "solid material having a density of approximately 3 lbs per square foot....tightly sealed, with no air gaps.....and reviewed by an acoustical consultant", indicates that the mitigation cited is not well done and allows for a great margin of error on a report that already considers noise to be at a maximum. Because the Environmental Noise Assessment report only discusses the covered lumber storage wall to be built as per plan, it would allow greater ability in the noise levels to be heard in receptor sites around the rear of the covered lumber storage building and other eastern and northern property lines. Construction of a wall other than masonry will add to the already marginal nature of what Homewood is willing to provide to mitigate the maximum noise levels to the surrounding residential community. The Environmental Noise Assessment report also indicates that there will be a "barrier" to break the "line of site to source". This is an inaccurate assessment since there is a limit to the extent of the covered storage building along the eastern property line and a vehicle driveway opening to the south. There should be an extended sound wall along the entire eastern border at a minimum of 12 ft tall. I would guess the Trailer Park would appreciate a masonry wall along the northern border of Homewood's property.

The Criteria for Acceptable Noise Exposure for "short duration events near residential areas" is at best another marginal issue associated with a dynamic operation which is expected to grow and change to suit their needs. The missing guiding verbiage should include events "abutting residential areas". The Town zoning ordinance 13.30.070 stipulates that "Notwithstanding the above requirements (noise tables 3-2 or 3-3), no person shall allow or cause the generation of any noise of a type, volume, pitch, tone, repetition or duration that would be found to be a nuisance by a reasonable person beyond the boundaries of the property where the noise is generated". As shown in the Environmental Noise Assessment the noise levels, even through mitigation, allows for ZERO margin of error. Upon review there is no allowance for the increase of noise through the growth of operations. Table 7 of the MND indicates marginally acceptable levels of noise levels ONLY during daytime hours as mitigated ONLY with the 20 ft covered storage building as described above and which does NOT surround the property. Regardless of the proposed mitigation, Table 7 also indicates that there would be unacceptable noise levels for all nighttime activities. This report appears contrived considering that it cites the need for mitigation and then through the proposed mitigation Homewood's noise levels would remain at the maximum the Town code allows. Overall this report should be considered inadmissible. There must be further mitigation and additional reports commissioned in order to be better informed of the noise nuisance.

Although Table 3-3 of Town Code Section 13.30.070 does make some reference to acceptable nighttime noise, the code standards are very arguable in that the mitigation suggested will not alleviate that "no person shall allow or cause the generation of any noise of a type, volume, pitch, tone, repetition or duration that would be found to be a nuisance by a reasonable person beyond the boundaries of the property where the noise is generated", as cited in the Town zoning ordinance 13.30.070. Even though the MND noise mitigation includes language to limit activities to daytime hours, as worded, it is only a strong suggestion. How is the Town going to legislate this very sensitive part of a private business's operation? The Town has very little "graveyard" noise ordinances, and what we do have errs on the side of caution for the residential community. Why are we encouraging disputes, complaints and possible litigation? All that said, it is obvious that the mitigation measures #27 & 28 will NOT provide a "less than significant" impact.

Regarding **Building Aesthetics** of the MND report; it considers that "the building mass would adversely affect the visual quality of the project area depending on the design of the exteriors" and would be mitigated by the introduction of "facades". While this may be true, the MND report does not address the "closed sky" effect brought on by tall buildings of mass when constructed so close to the street. Rocklin has mitigated a lot of the "closed sky" effect by having nearly all commercial buildings setback from the roadway by good margin. Homewood, or any structure on this property, must contend with the lack of usable land due to floodplain encroachment. Creating a "closed sky" does not seem a suitable use for a major corridor into Loomis. Furthermore the wholesale loss of heritage trees will add to the bland and flaccid roadside view at this corner. Although the Town allows for the mitigation of trees, clearly over 75% of the trees on this sight are proposed for removal. This seems like a large percentage and does not fit with the best interests of the residential community. I see no provision for trying to design around quality trees (except to use non-binding language saying "The proposed project shall be designed to avoid trees where feasible"). And for good reason; this operation needs as much clear land as possible, further adding to the unattractive aspect of what is considered reasonable in an "ILT" zoned district. I do not find within the current plan, and therefore do not accept, that the mitigation measures proposed will make this impact to our community "less than significant".

Respective of mitigating the **exterior lighting**; the MND report again attempts to legislate the operations of a private business to be sensitive to the surrounding residential area. Who will be in charge of insuring compliance and enforcement should the mitigation measure(s) be insufficient?

Regarding **Air Quality**; as a layman I cannot pretend to understand the technical terms of the PCAPCD or LOS D or NOx or CO and how they relate to what is considered good measuring data. What I do know is that the air quality of this residential community will suffer by an inordinate amount of trucking associated with a full service lumber operation. This again can be characterized as in comparison to the more minimal trucking requirements of a CG zoned business. The MND report downplays this operational

activity with statements of "The proposed project would not generate enough traffic to substantially alter CO concentrations at this or other intersections in the region". AND "Generation of objectionable odors is not expected to occur as part of the Proposed Project". These statements, regardless of the technical reports, do not take into account the Town code Section 13.30.90(6.J) "No obnoxious odor or fumes shall be emitted that are perceptible without instruments by a reasonable person at the property line of the site". Irrespective of Homewood considering itself a CG zoned business, this becomes another clear problem of legislating and enforcing an ILT zoned business within an abutting residential community. The Town again is encouraging complaints and discord, regardless of the proposed mitigation to legislate "turning off the engines of waiting trucks" of whom Homewood will have little or no control over.

Regarding the **Biological Resource** mitigation; I must refer to earlier letter(s) and complaint(s) in which I wrote to the Town as to Homewood's wholesale clearing of the property and the omission(s) within their original Planning Application. As I have made it clear in my own Planning Application, our family had noticed an abundance of wildlife utilizing the floodplain area. Whether their denuding of the floodplain land has harmed the wildlife is a question that the MND report does not adequately address. The majority of the wetlands described is scheduled to be destroyed to make way for "Phase 2" of the Project, and yet its development must wait mitigation and approval from the Army Corp of Engineers. Meanwhile the Town is considering allowing "Phase 1" to proceed even though Phase 1 does not deliver the required space for Homewood's operations. WHY?

Respective of **Cultural Resources**; I cannot offer much of an opinion, except to again consider the hasty decision to develop the floodplain with only construction workers as the first line of defense in determining what may be of archeological significance. This seems poor mitigation for the development of any major land site.

Regarding **Hydrology and Water Quality**; The MND makes a qualifying statement that "The Proposed Project would increase impervious surface slightly" and that "the project site is not an important recharge area" and that "the Project would not adversely affect aquifer characteristics". I disagree with these findings in consideration of the fact that Homewood has already disturbed a portion of the floodplain (unaddressed by the MND, see page 2) and the major portion of this site is within the floodplain area to be "backgraded 2 +/- feet". There is little effort in the MND to address to impact to water flow within a "relatively flat loading area" where "no structures could impede flood flows". Mitigation measure #23 discusses "feasibility"; in light of the sensitivity of water flow in our area, this mitigation does not go far enough to insure the safety of upstream residents.

Mitigation measure #25 discusses "temporary storage" and "storage above the 100-year flood elevation"; without direct reference, this seems to apply to the "Phase 2" aspect of development. I disagree with the descion to allow any use of the phase 2 floodplain before it is more fully reviewed AND APPROVED. In addition, which agency will be in charge of monitoring the "storage" as to its height or an items "temporary" status? Again this is an attempt to legislate a private business and should their in-house policing methods fail, it will be others who will suffer. And how is it supposed that a "jag of lumber" or a vehicle is going "to be secured to be prevented from falling into flood waters or floating into the drainage pipe and restricting capacity"? This mitigation is also unsatisfactory.

Regarding **Land Use and Planning**; the MND report is in error when stipulating that "this Project is in an area not presently developed, so it would not divide an established community" and "The Proposed Project would not construct any buildings or roadways that would interrupt existing circulation". On the contrary, this project IS abutting a developed residential community AND will produce an inordinate amount of traffic as Brace Road would become more heavily traveled. The MND report also obfuscates the CG zoning allowances by stating "The project site is designated and zoned for general commercial development, such as.....lumber yards....". While Section 13.26.040, Table 2-6 does refer to a particular activity of a "lumber yard"; Section 13.26.020(B) makes no such reference to lumber yards and goes on to include the CG zone to be appropriate for a "range of retail uses", in which, "General Retail" as defined by Section 13.80.020 specifically excludes "outdoor sales of building and landscape materials". As per my above expose' of ZONING, I believe that the any mitigation in this Land Use will produce an impact that is "more than significant".

Regarding **Population and Housing**; appears accurate enough, but its conclusion of the need to "widen and increase the capacity of the roads" contradicts the conclusion found in Land Use and Planning. Whereby there would be "no roadways constructed that would interrupt existing circulation", although the circulation along Brace Road will indeed be interrupted. This would seem something of an oxymoron. Homewood will improve their particular road frontage, thereby not expecting that their business will affect traffic along Brace Road? If this is a proper interpretation; I consider the conclusion as flawed. Brace Road will incur increased circulation, and as a two lane road it will be affected regardless of Homewood improving their own street frontage.

Regarding **Public Services**; Mitigation measure #31 indicates that power to the Project is marginal. If this commercial site is to receive power from the same source as the residential grid, I think this to be yet another effort by Homewood to marginalize their expenses at the potential sufferance of the residential community. I suggest the proper mitigation of power to this site, *and in consideration of future growth*, be that Homewood obtain a dedicated power source so as not to impinge upon the residential neighborhood.

Upon review of the **tentative map**; the setback location from an abutting residential zone of the covered storage building violates Section 13.26.040, Table 2-7 CG district development standards. The setback for this structure should be 15 ft from the property line, not the 10 ft as shown by scale. For reasons of the marginal nature of this project, I think that all other setbacks for this type of commercial project should be reviewed also.

Considering the **traffic flow** of vehicles and large trucks there is also little margin for error as traffic must be directed so as not to create a nuisance on Brace Road. The traffic plan for Brace Road is inadequate, and as currently planned, there is no indication to widen Brace Road. In a perfect world, it's been described that large trucks will enter via ONLY north from Sierra College and exit either the same direction or via Brace Road. The traffic plan for Sierra College Blvd appears possibly adequate, but would be better served to have a dedicated fourth right turn lane into the Homewood property. Ultimately, the traffic impact is great enough that an engineered roadway improvement plan is called for and the current mitigation is unsatisfactory without it.

For this project to allow safe ingress and egress to Brace Road the project requires further review of the feasibility for large trucks to access Brace Road. I believe the existing southerly right hand turn lane should be extended the entire frontage of the Homewood property and include a bike lane along with curb, gutter and sidewalk. The MND report makes a reference to a "left-turn pocket into the project". Additional safety dictates that some sort of center dual turn lane along the entire property frontage should be designed to allow for the wide turning radiuses required of large trucks leaving Homewood and entering Brace Road, while allowing for the margin of error of large trucks wanting to enter Homewood from Brace Road. Additionally, also for safety, there should be another lane and/or improved shoulder and bike lane added to the eastward lane of Brace Road to accommodate large trucks.

Another consideration is where the many large trucks supplying product to Homewood will stage themselves as they stack-up prior to Homewood's opening for business. It is a typical part of this type of business to have "common carrier" trucks show up to their destination during late night hours in order to unload the following morning. At times there can be two or three or more large trucks waiting to gain entrance to unload at Homewood. The current plan shows no space allowance for this condition and requires review and mitigation.

Homewood also has easy access to the railroad spur on Taylor Road. It has been stated that Homewood will not require nor need to utilize this shipping point. In due consideration of the inability to fully predict the future, there should be some reference to the need to mitigate the possibility, even if remote, of using Taylor Road, Sierra College Blvd and Brace Road to ferry materials and vehicles to/from the Taylor Road railroad spur. This also needs review and mitigation.

Reviewing the **adequacy of parking**; Section 13.36.040, Table 3-7 allows for the minimum stalls specified for a non-multi use facility of a "Retail Trade" category. ONLY THE MINIMUM requirements under "Appliances, building materials, and furniture stores" have been applied, creating a recipe for a nightmare of on-street and remote parking. The MND report contradicts itself, in that, by offering an acknowledgement of the "generally consistent" activity of "*Building/landscape materials sales – Outdoor*", it does not take into account the parking area required for the outdoor space utilized.

The MND report considers Homewood's business as "*generally consistent with the categories of Building/landscape materials sales – Indoor and Building/landscape materials sales – Outdoor*" and that "*these categories do not fully describe the activities that could occur*". Section 13.36.040(A-4.) stipulates "A single use with accessory components shall provide parking for each component." While Homewood's multi-use activities have not been fully described in the MND, a cursory review of the required parking indicates that many "accessory components" have been excluded from assessing the proper parking.

To single out one activity that the MND report wants to include, either the new "Assembly of building components" or the more appropriate "Manufacturing/processing – light". Considered under Table 3-7, "Manufacturing **Processing** and Warehousing", and without involving any other outside other "accessory components", it would create the need for an additional 25 – 30 parking stalls.

Also, the MND report again contradicts itself, in that, under chapter 2, Description of the Proposed Project it is already clear there will be an insufficient parking area available to employees alone. Homewood's current operation employing 65 people requires more than the proposed 49 or 50 stalls irrespective of the need for customer parking and an allowance for future growth. The singling out of this portion of the many Table 3-7 conditions as the ONLY criteria for allowable parking is another "cherry picked" item helping Homewood to fit into a marginally challenged location, leaving no room for error.

Even considering this a resolvable issue, parking will require more space which this site has difficulty supporting. This condition requires review and mitigation. This point also raises the need to halt this project until both Phase 1 & Phase 2 can be developed as one project.

Regarding the **Mandatory Findings of Significance**; I disagree with the conclusion that "the Proposed Project's cumulative impacts would not be considerable, so the cumulative impacts of the project would be *less than significant*". There are many study's and issues of mitigation contained herein that are flawed and need further review. There are many other issues contained herein that are not even represented by the MND report. All together, the cumulative consequences of this Project will have substantial adverse effects on human beings and this residential community. The mitigation contained herein, either proposed or currently not done, makes for a **potentially significant impact**.

For Example: Without both phases being built together the parking, the trucking, and the storage areas will all be insufficient. The MND report does not fully address the mitigation of a Phase 1 only development. Because "phase 2" is critical to the ability for Homewood to relocate and maintain its current 5+ acre operations, I believe that "phase 1" and "phase 2" are inseparable and should be mitigated together. "Phase 1" alone will not support the operation or traffic flow. And because "phase 2" requires additional mitigation, I suggest that the entire project be held over for a single review.

In Closing:

It seems that a lot of confusion can be made clear when this project is viewed in the proper context. Within chapter 2, under Phasing, (pg10 P2) there is brief mention of what will ultimately make sense for the relocation of Homewood's operation; Their "Phase 3" interest to develop within the floodway. This added acreage, were it outside the floodplain, may have easily allowed Homewood's operation and manufacturing facility to be mitigated enough to fit the community. The fact remains that Homewood wants to fit a growing operation on marginally available land, while working to procure additional land in the years to come. Yet to reach this goal they are seemingly willing to side step certain issues and unwilling to give up certain operations that, in the short term, will be a nuisance, agitate and generally be unfriendly to the existing community.

569
570 The marginal aspect of the space required for Homewood's operations indicate that that both Phase 1
571 and Phase 2 being developed together would provide the best ability for their activities to operate and be
572 mitigated effectively. With both phases built together, Homewood will be in a better position to embark
573 upon Phase 3 within the floodplain.
574

575 The need for a zoning change seems an extreme measure to accommodate an activity already
576 addressed within the Town ordinances. The fact that the town considers it necessary to make a change
577 specifically to benefit Homewood and that affects the entire town reflects the fact that the Homewood
578 operation is NOT being properly reviewed to fit this property location. The reason so much mitigation is
579 required for this project is twofold; One, a large business is wanting to utilize limited space within a
580 floodplain; Two, a business that is better suited for "light industrial" zoning is trying to conform to a
581 "general commercial" district, and in so doing is further complicating the process by trying to conform with
582 an abutting residential neighborhood. I think it unreasonable to develop Loomis, and this Homewood's
583 parcel, under these conditions. The loser(s) will ultimately be the nearby residents, of who the Town's
584 charter claims to protect.
585

586 Homewood is currently, and properly, located within an "ILT" zoning district. They enjoy operations
587 unhampered by residential interference. It seems right that the Town would make a better effort to
588 relocate Homewood to an area more agreeable with their current and growing operations. Homewood
589 should not have to be concerned with the constant adversity created by disrupted and aggravated
590 neighbors. Just as Homewood should be free to work their operations to the "enjoyment of the land", so
591 should the residential community here on Brace Road be allowed the enjoyment of their land to the
592 exclusion of improperly mitigated nuisances created by a business that isn't making a better effort to fit in
593 to the existing residential community.
594

595 It is considered by some that the prospect of a Lumber Yard is daunting because it's new and different,
596 invoking anxiety, and unwarranted concerns. I believe the dismissal of this view is typical of those who
597 may be unaffected and are unaware of the introspection required to guard against personal impacts. This
598 view is completely appropriate of people living nearby and unaware of a business' scope of activities.
599 Homewood has not fully represented its nature and scope of activities to the residential community nor
600 attempted to mitigate impacts to be well within any margin of error. The activities that have been revealed
601 in the many of the reports create a "more than significant" impact, regardless of the mitigation measures
602 in the MND. This Project IS daunting because a realistic review reveals a project ill suited to fit within the
603 residential neighborhood. For example; regardless of the nearly non-existent Town codes governing
604 nighttime noise and regardless of the mitigation measures suggested; Noise is much more audible during
605 the nighttime hours and will be completely disruptive to the surrounding residents, and is altogether
606 unacceptable in promoting a good neighbor policy.
607

608 This project is working within several marginal limits, some known and some unknown, from traffic and
609 parking to being community friendly. What is being overlooked is the long sighted view of business growth
610 and the likely event that rules, laws and codes will be bent in order for this business to function properly.
611 To consider that certain conditions can be legislated and adhered to is at best naive and at worst opening
612 a pandora's box of complaints, enforcement and possible litigation in allowing an ILT zoned operation into
613 a CG zoning district.

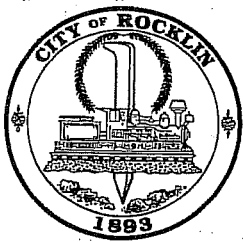
614 While many mitigation measures may be appropriate, in the end, there is absolutely no margin for error
615 for mitigating this Project to fit into this community. Development of this land, regardless of who owns it,
616 should require a comprehensive plan showing every setback, road improvement, elevation and light post.
617 This piece of land is both high profile and ecologically sensitive and begs for an un-hasty review and
618 additional measures of mitigation. Homewood's business activities should include a comprehensive report
619 stating more than a simple, semantically challenged, view of office vs. warehouse vs. outdoor area, etc..
620 A better description of Homewood's scope and nature of activities is needed in order to better assess
621 appropriate design and mitigation for this parcel which, if designed without any margin of error, has the
622 potential to be a source of future trouble and possible litigation. The Draft Initial Study and Notice of intent
623 to Adopt a Mitigated Negative Declaration for the Homewood Lumber Relocation Project mitigation
624 measures do not, overall, make the environmental impact "less than significant".
625
626

627 I would challenge the people wanting to see this project move forward to be more respectful of mitigation
628 that would be more friendly to the community. To show that the project can be designed with a better
629 margin for error as the years move forward. Instead of pushing the limits of zoning, land use, mitigation,
630 etc., why can't this project be more compliant to fit within the abutting residential community?
631
632

633 Respectfully,

634 
635
636 Kai Krienke
637
638

639 cc: Brian Frাগiao, P.E.
640 Thomas Millward, Mayor
641 Perry Beck, Town Manager
642 Town Council Members; Walt Scherer, Rhonda Morillas, Russ Kelly, Miguel Ucovich
643 Planning Commission; Greg Obranovich, Janet Thew, Jo-Carol Arisman, Jean Wilson, Micheal Hogan
644



City of Rocklin

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www.ci.rocklin.ca.us

January 22, 2007

RECEIVED

JAN 22 2007

TOWN OF LOOMIS

Kathy Kerdus
Town of Loomis
6140 Horseshoe Bar Road, Ste. K
Loomis, CA 95650

RE: Draft Initial Study and Notice of Intent to Adopt a Mitigated Negative Declaration
for the Homewood Relocation Project

Dear Kathy.

Thank you for the opportunity to review the above-referenced document. The City of Rocklin initially commented about the development of the project location in a letter dated March 24, 2006 and noted preliminary concerns about traffic, aesthetics, noise, drainage and coordination of street improvements that needed to be addressed. In reviewing the Mitigated Negative Declaration (MND) the City of Rocklin believes that several issues are not adequately addressed. Rocklin would prefer to have the opportunity to meet with representatives of the Town of Loomis in order to have a two-way discussion towards resolving issues that concern Rocklin and Loomis as it relates to the Homewood Lumber project and other developments that are been proposed along the Sierra College Boulevard corridor within Rocklin and Loomis.

The following are our comments on the Mitigated Negative Declaration (MND):

1. Water Supply

This section is totally inadequate in its discussion and conclusion regarding water. PCWA has recently identified problems in servicing the Homewood Lumber project due to potential impacts to potable and fire water supply. A recent hydraulic analysis prepared for the proposed Rocklin Crossing Project, within the City of Rocklin, indicates that the Homewood Project will also have measurable impacts on the operation of PCWA's system. The Town of Loomis has been made aware of the water problem in recent letters sent to Kathy Kerdus, Planning Director for the City of Loomis. In light of information from PCWA, the MND must be found to be inadequate and appropriate mitigation coordinated with PCWA. To simply condition the project on meeting PCWA requirements fails to give the decision makers a full disclosure on the potential project impacts upstream, should major upstream improvements be required to mitigate inadequate water supply.

2. Drainage

It is unclear what efforts will be made to prevent downstream flooding as a result of increasing the project site's impervious surface area. The project's hydrology mitigation measures need to include the provision of on-site detention and/or retention as required by the Placer County Flood Control and Water Conservation District's Dry Creek Drainage Master Plan. Several Rocklin areas just downstream of the project are currently served by inadequate drainage facilities and are currently subject to flooding even during small rain events. The document fails to review how this project may affect downstream flooding.

3. Traffic

One area of deficiency in the MND is the lack of the discussion of merging and weaving movements on Sierra College Boulevard that will be associated with the Homewood Project. The City of Rocklin is currently in the process of designing the widening of Sierra College Boulevard from Granite Drive to Taylor Road under the authority of the South Placer Regional Transportation Authority (SPRTA). Responsibility for the installation of these improvements within the Town of Loomis boundaries is still uncertain. Partial street improvements within Loomis, particularly associated with the Homewood Project, can cause significant merging and weaving problems particularly if they are not coordinated with the proposed improvements on Sierra College.

The City of Rocklin agrees with the need to either eliminate the access to Sierra College Boulevard or provide an auxiliary lane that would allow trucks to decelerate without slowing through traffic, and also with the need to provide a left-turn pocket on Brace Road. If a deceleration lane is provided on Sierra College Boulevard, it should be provided as part of the project's right-of-way dedication and should not be part of the future through lanes of Sierra College Boulevard. Because of the jurisdictional boundaries in this area, it is requested that the project's frontage improvements, including any landscaping, median and driveway configurations, be coordinated with the City of Rocklin's Engineering Division of the Community Development Department.

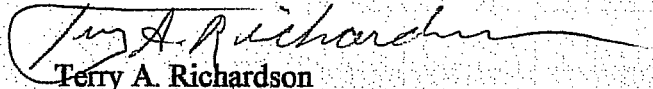
It is noted that the project's improvements will require reconfiguration of the signal at Brace Road and Sierra College Boulevard. The reconfiguration of this signal should be required as a mitigation measure and identified as a responsibility of the project, and should also be coordinated with the City of Rocklin's plans for widening Sierra College Boulevard as discussed above.

January 22, 2007

Page 3

If there are any questions or the need for clarification on any of the above comments, please feel free to contact myself or David Mohlenbrok at (916) 625-5160. Our City Manager will be contacting Perry Beck to coordinate a meeting between your representation and ours.

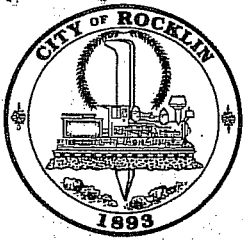
Sincerely,

A handwritten signature in black ink, appearing to read "Terry A. Richardson", with a long horizontal flourish extending to the right.

Terry A. Richardson
Community Development Director

cc: Rocklin City Council Members
Carlos Urrutia, City Manager
Larry Wing, Engineering Services Manager
Perry Beck, Loomis Town Manager

Tar/F/Homewood Expansion Ltr3



City of Rocklin

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RECEIVED

March 5, 2007

MAR 07 2007

TOWN OF LOOMIS

Kathy Kerdus
Town of Loomis
6140 Horseshoe Bar Road, Ste. K
Loomis, CA 95650

RE: Draft Initial Study and Notice of Intent to Adopt a Mitigated Negative Declaration
for the Homewood Relocation Project

Dear Kathy,

Thank you for reviewing the City of Rocklin's comments in our letter dated January 22, 2007 regarding the Homewood Lumber Company project at Sierra College Blvd and Brace Road. Subsequent to the letter, Rocklin City Manager Carlos Urrutia, Loomis Town Manager Perry Beck, along with elected officials from both jurisdictions, met to discuss our concerns. From that meeting, it is the City of Rocklin's understanding that the Town of Loomis will incorporate the following as conditions to the reference project:

1. The Sierra College Boulevard roadway improvements, from Taylor Road south to the Rocklin City Limits, will be constructed in accordance with the future plans of SPRTA. As you are aware the improvements plans are currently being prepared, by SPRTA, for this section of Loomis along with areas within the Rocklin City Limits.
2. Loomis will require the Homewood Lumber Company developer to meet the requirements of the PCWA for adequate water to serve the developing area around the Sierra College Blvd/I-80 Interchange, both in Loomis and the City of Rocklin as identified by PCWA.
3. That Loomis will condition the project to require drainage detention in accordance with the requirements of the Placer County Flood Control District.

February 27, 2007

Page 2

Rocklin appreciates the cooperation between the Town of Loomis and the City of Rocklin and subject to above agreed upon issue, the City of Rocklin withdraws its objections to the Homewood Lumber Company project as were previously mentioned in the Rocklin letter dated January 22, 2007.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry A. Richardson", with a stylized, flowing script.

Terry A. Richardson
Community Development Director

TAR/cj

cc: Rocklin City Council Members
Carlos Urrutia, City Manager
Larry Wing, Engineering Services Manager
Perry Beck, Loomis Town Manager

Tar/Homewood ltr of agree

(11)

Comments from Janet Thew 1/22/07

Neg dec comments:

pg 32, Mit. Measure 10-

Choice of mitigation bank should be given to town or environmental consultant, not applicant.

pg 32, Mit. Measure 11-

Please change to "Temporary fencing shall be placed AND MAINTAINED around..."

pg 34, Mit. Measure 13-

I see a high potential for this measure to be rendered all but useless in the political process. The impact is only less than significant if the mitigation is incorporated, which would mean a neg dec might no longer be appropriate. There will be no room for planting more than a few trees onsite, and certainly not room for oaks with any chance of survival. That leaves planting over 1000 oaks elsewhere or the \$528,500 fee, or a combination. If this mitigation measure gets watered down in the approval process, at what point is any compromise no longer adequate mitigation for the loss of so many oaks? If the applicant doesn't want to pay the fee and would rather plant oaks, who decides where 1000 of them would go? Are there enough sites even appropriate considering the tree cover Loomis already has? Who will be monitoring their survival rate? The survival rate for mitigation oaks is not good. Planting young oaks along streets does not make up for the loss of tree cover on site. Shouldn't there be some minimum fee below which political dealmaking could not go?

pg 40, Mit. Measure 16-

Will the new grading ordinance apply to this project?

pg 48, under Operation-

How does the MSP address the large increase in impervious coverage created by this project?

pg 57, Mit. Measure 27-

According to pg 11, loading and unloading (using forklifts) can start as early as 5 am in the summer. The quieter forklifts only save 5 dB. The neighbors across Brace could have legitimate complaints about noise, as they will be directly across from the driveway rather than the 20' tall building.

pg 68, Mit. Measure 32-

Traffic on Sierra College Blvd will only become more horrendous. The traffic study says the "ideal" choice would be to eliminate the SCB access from the project at some point. That would mean all site traffic would use Brace. All the noise impact calculations would no longer apply. Again, the neighbors could have a greatly reduced quality of life.

pg 74, Discussion-

(b) "The proposed project would contribute to cumulative traffic congestion, air quality degradation, noise, demand for public services and utilities, AND THE LOSS OF TREE CANOPY AND PERVIOUS COVERAGE."

Kai Krienke
5397 Brace Road
Loomis, CA 95650

RECEIVED

JAN 29 2007

January 29, 2007

Perry Beck, Town Manager
Town of Loomis
6140 Horseshoe Bar Rd, Suite K
Loomis, CA 95650

TOWN OF LOOMIS

Re: Planning Protocol re: Homewood Relocation

Dear Perry,

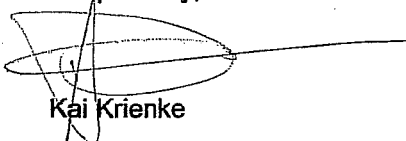
Thank you for meeting with me today in response to my Jan 26th letter to the Mayor to discuss the protocol process of project development within the Town of Loomis. I will, in a separate letter to Mayor Tom Millward, offer a more realistic and direct interest in relating a "proper" protocol of public interest towards the Homewood Relocation Project.

You pointed out the standard protocol involving the Planning Commission Staff had been pursued for the Homewood project. You also pointed out that some projects do, indeed, follow a less "standard" path, in which, there is a public involvement BEFORE and during the informal / internal review period for the "larger" projects. Homewood's "standard" path of Planning has left the public with one month to review, research and comment on hundreds of pages of reports. The Town's "standard" path of Planning for Homewood has allowed a "formal public hearing" (Tues, Jan 23rd), in which, another two reports (one 16 page; one 13 page) were presented on the spot, to the public in a forum where they were apparently expected to review these reports and respond within their "formal hearing" time; speaking for 5 minutes and allowed only once to speak.

In my opinion, Homewood's project qualifies as "large", perhaps not in the usual sense of size, but most certainly in terms of scope. The Town of Loomis should have recognized a year ago that the amount of potential mitigation, conditions, and zoning questions would make for a very difficult fit within a marginal piece of land. And now at the "Eleventh Hour", the Town considers it has satisfactorily noticed the Public. Any clear thinking person would consider this process flawed and I certainly expect more from our Town Officials entrusted to express concern for its citizens.

I would like to take this time to request that the "Clock be Turned Back" and the Homewood project be temporarily taken off the Planning Commission Agenda. In due consideration of a blemished planning process already "on the table", I suggest the Town of Loomis seize the time to re-review their planning process, take a more measured approach and allow for the public to have more time to digest the volume of reports and become actively involved. I also request that there be a peer review of the reports already prepared in consideration (and possible conflict of interest) for Homewood. An additional set of reports may confirm or deny the need for a complete Environmental Impact Review of Homewood's project, and thereby move it forward in everyone's best interests.

Thank you for your time and response.
Respectfully,



Kai Krienke

cc: Thomas Millward, Mayor
Kathy Kerdus, Planning Director
Greg Obranovich, Planning Commission Chairman
Planning Commission; Janet Thew, Jo-Carol Arisman, Jean Wilson, Michael Hogan
Town Council Members; Walt Scherer, Rhonda Morillas, Russ Kelly, Miguel Ucovich

Kai Krienke
5397 Brace Road
Loomis, CA 95650

RECEIVED

JAN 29 2007

January 29, 2007

Thomas Millward, Honorable Mayor
Town of Loomis
6140 Horseshoe Bar Rd, Suite K
Loomis, CA 95650

TOWN OF LOOMIS

Re: Homewood Relocation Public Agenda Program

Dear Mr. Mayor,

In a follow up to my letter of Jan 26th, I have been further educated as to the process of developing a complex project as Homewood's. The Town Council Agenda meeting of Feb 13th I requested ("Homewood Relocation Public Review and Comment") is actually something more like a meeting(s) in the nature of a "Public Workshop" in more of a town hall forum and would include the Town Officials (Town Council & Planning Commission) along with the Public. I expect it should not be too late to request this courtesy and it seems that this "Public Workshop" action may save some valuable time, especially had it been initiated months ago.

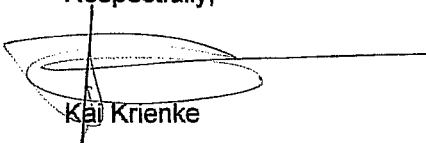
Additionally, due to the current monumental amount of mitigation and conditions placed upon Homewood's project, I suggest that the Town would be better served to work with Homewood in some sort of "Development Agreement" involving Public interests. This program may lead to a better respect of specific issues between all interested parties, which, hopefully, will introduce meaningful mitigation less reliant on Homewood policing themselves. And, in turn, secure the Town from being overrun with complaints, enforcement and potential litigation issues.

Regardless of format, I remain interested to initiate a separate program(s) agenda involving the public to provide an opportunity for a "Q & A" format and a quality dialog of issues. A "Public Workshop" will pave the way for a more healthy dialog and allow for a point-counterpoint exchange of views.

Please create and schedule some sort of Public Agenda in the form of a "Public Workshop" and/or "Development Agreement" for this project prior to any Planning Commission approvals. A project as complex as Homewood's Relocation to the corner of Brace Road and Sierra College Blvd deserves a more thorough review period.

Thank You, I can be reached by mail or phoned at home (916) 652-0231 and will respond timely.

Respectfully,



Kai Krienke

cc: Kathy Kerdus, Planning Director
Perry Beck, Town Manager
Greg Obranovich, Planning Commission Chairman
Planning Commission; Janet Thew, Jo-Carol Arisman, Jean Wilson, Michael Hogan
Town Council Members; Walt Scherer, Rhonda Morillas, Russ Kelly, Miguel Ucovich

RECEIVED

FEB 02 2007

2-31-2007

13

TOWN OF LOOMIS to whom it may concern -

or Perry Beck - Town Manager

We are aware there will be Commercial business on this location Retail Etc.

We don't need an amendment to the town zoning ordinance. There has got to be locations in the Loomis area to build a Lumberyard and Door Factory in one of the industrial areas.

May 2 repeat this is not an Industrial area. Its a Residential Area. People leaving in the A.M. for work and P.M. coming home, in Gridlock

and what's this they are going to enter and leave by way of Bruce this is definitely a No No.

Please hear us, put yourself in our place this is not a good plan for the Loomis residents that live in the area.

Tom Millward, Miguel Uscovich - Ronda Morilla
Walt Scherer, Russ Kelly back ~~up~~ up
we need your help. I think when we vote
we are under the impression you will
step in and stop this kind of thing from
happening,

Citizen and Tax Payer
Larry Morokov



**West Coast
Mobile Home Parks, Inc.**

Richard Delaney
Suzanne Michaelson
Hazel Bautista

February 2, 2007

Kathy Kerdos
Planning Director
Town of Loomis
6140 Horseshoe Bar Road #K
Loomis CA 95650

(916) 652-1847
Fry

Dear Kathy:

I am the owners and Operator of the Loomis RV Park adjacent to the proposed Homewood Lumber Site on Brace Road and Sierra College Boulevard.

I have reviewed the material provided by the Town of Loomis and other material including correspondence and articles from the Loomis News.

It seems to me that this is a problem that can be solved by compromise. The retention of the 65 jobs and the potential for added jobs and revenues for the town are important. So too are the property rights of the Noorani family who have purchased the property with the expectation of usage. The concerns expressed by the Coles, Neals and Raymonds are real concerns. They need to be addressed too. I believe that the major problems can be addressed with a combination of landscaping plans and operating restrictions. Certainly the plant must not operate 24 hours a day. Indeed, there must be restrictions on operations and noise. Certainly there must be a border around the perimeter to protect both the environment and the neighbors.

I have seen a project like this in another town that was modified to be a plus for everyone. It seems like the idea of a park along the creek combined with an attractive landscape land would go a long way towards meeting everyone's needs. I for one would support a proposal like this and urge its consideration.

Sincerely,


Richard Delaney

RECEIVED

FEB 05 2007

TOWN OF LOOMIS

To whom It May Concern

Homewood Lumber wants to locate its Lumber yard in the wrong location. This location is not zoned for industrial use. The lumber company, factory, maker of doors should have its new business located in an industrial area, where there are no homes and apartments that will be across from it where people live & sleep at night. We understand that this business would be working 24/7 with noise & interrupting traffic & (which there is no way for them to go in & out other than Brace which is a small 2 lane street equipped only for residential traffic. Please stop Homewood Lumber now & locate them in an Industrial Area!!

Sincerely,

Taxpayer & citizen

Arlene / Monahan

Hi My Name is Sharon Oerding.

My Husband Steve and I moved to Loomis with the idea that Loomis was a no growth town. After living in Rocklin since 1978, we made our move with the idea that this town was the best thing for our children, as our daughter has Auto-Immune disease as well as other medical problems and our son has Asthma just like me. I also have a form of Auto-Immune Disease and am currently under Doctors Care. We do not want Homewood relocated on Brace and Sierra College Blvd. We both agree this will bring in more Noise, more traffic; the emissions will be over 10 pounds per day for NOx. The PCAPCD indicated that cumulative air quality impacts could be mitigated to a Less-than-significant level by contributing to the PCAPCD's fund, what does this mean? Are they saying it's ok if you pay into a fund or acquire emission offsets or purchasing emission reduction credits on the open market? We both feel for Homewood but with some thought, there must be some better suited location in Loomis that is not next to Apartments and Homes, a area that will do less damage to the environment, air and the health of our children?

I have attached with my letter, research that was preformed at UC Davis regarding the link between Ozone Pollution and asthma. Please read the information, which is from a very respected Doctor at UC Davis. If you would like anymore information on research that is being done please contact Steve at UC Davis (530) 752-9551 or Sharon at 652-8325.

It needs to be understood that although we know Loomis needs to grow, it should not be considering a Heavy Industrial Business in this location. It makes no sense to allow it in populated residential area. This area should be considered for a park, and the land preserved, acting as a green zone that will help clean the air, instead of the vernal pools being graded and concealed, and the property sprayed with pesticides before an environmental impact review is even started.

It goes against all of the community values, and what the ones that came before us had entrusted to you, the elders of this community, to protect and make decisions wisely. To stand up for right and good, not to be tempted by money and greed.

Is it really a wise decision, and in the best interest of Loomis to allow the leveling of this property, destroying all of the nature that has been there long before us, scraping it away, and replacing it with a 35 foot high metal box that will be spewing toxics emissions on our town, neighbors, community and our children, as hundreds of trucks roar up and down our roads 24 hours a day? The answer seems to be clear, it just need to be heard.

Thank you for your thoughtful consideration,

Steve and Sharon Oerding

RECEIVED

Kai Krienke
5397 Brace Road
Loomis, CA 95650

FEB 06 2007

February 6, 2007

Kathy Kerdus, Planning Director
Town of Loomis
6140 Horseshoe Bar Rd, Suite K
Loomis, CA 95650

TOWN OF LOOMIS

Re: Revised Exhibit B
Recommended Conditions of Approval
Homewood Lumber Relocation, 5221 Brace Road
Planning Commission (meeting) 01/23/07
and
#06-10, Conditional Use Permit, Tree Permit
Mitigated Negative Declaration
Zoning Ordinance Amendment for CG Zoning District
APNs 044-123-057 and 044-123-069
STAFF REPORT PLANNING COMMISSION MEETING of 01/23/07

Dear Kathy,

In preparation of today's Planning Commission meeting, I am interested to bring to your attention some concerns in reference to the "Revised Exhibit B" "Recommended Conditions of Approval" "Homewood Lumber Relocation, 5221 Brace Road" as submitted during the "Planning Commission (meeting) 01/23/07". These conditions, along with the "Staff Report" for the Planning Commission meeting of 01/23/07, continue to support my initial concerns that this project is being reviewed for the benefit of Homewood. The Staff Report contains language supporting an overall view that Homewood will "do the right thing" and therefore only the minimal, legally required, pre-planning is necessary. Homewood is a non-conforming business wanting to relocate to a parcel with many conforming restraints. Please reconsider the planning needs for this project to require a binding "Development Agreement" more considerate of the adjacent residents.

Generally it concerns me, and this residential community, that these documents continue to define this project as somewhat "standard" by downplaying the complexity of a major, initially non-conforming, business being developed abutting a residential community. The complexity of this project is clear when taking into account that there are a total of 33 mitigation measures as declared in the Draft Initial Study and Notice of Intent to Adopt a Mitigated Negative Declaration (herein after referred to as MND). Add to that another 13 sub-measures. Then add that out of 100 conditions in the above noted "Recommended Conditions of Approval", at least 53 are specific to Homewood's parcel development. My point being that this project **IS** complex due to its non-conforming nature of operations combined with the need to fit into a residential area.

The sheer number of mitigation and conditional issues shouts out the need for a "Development Agreement" between the Town and Homewood. It is important to "pin down" the actuality of what activities and operations will be permitted by Homewood's use of this land. It is important to "pin down" the intention for space requirements vs. available land, architectural design and limit of land use. In my opinion, the "Recommended Conditions of Approval" and the original MND rely too heavily on Homewood to follow through with non-binding conditional issues. Instead of clear references of "shall do", these Conditioning Documents and Reports are littered with the non-binding language of: "If feasible", "every attempt", "limited as (future) approved", "shall be submitted" (in the future), "prior to approval", "substantially in accordance", "shall be reviewed", "if applicable". If this project were just another small development, I can understand that the perceived minimal impact to any area would not require binding language. Homewood's project may be small in size, but its location and scope of development is a serious impact to the surrounding community and warrants a binding "Development Agreement".

The "Staff Report" appears primarily reliant upon the "expert" (Homewood paid) environmental reports, the MND and the Town Codes. I remain inclined to disagree with some of the Staff Report findings, many of which I have addressed in my prior letters. I can understand that due to the scope of this project some issues may "fall through the cracks", all the more the need to do more "pre-planning".

With respect to the **"Recommended Conditions of Approval"**:

Item #2 does not have the final "Mitigated Negative Declaration and Mitigation Monitoring Program" attached. Additionally, I consider it unrealistic that the Public would be expected to understand a "final" report in the space of a two to four hour Planning Commission meeting.

Item #3 is in conflict with Item #4 in that, "only in accordance" is binding vs. "substantially in accordance" is not binding.

Item #11 does not differentiate between the usable non-floodplain land and the hydrology challenged, permit required, floodplain area of "Phase 2". Also, there are at least four conditional items referring to the conditions of use with in the floodplain. Yet the floodplain demarcation survey is not required to be defined prior to being disturbed and prior to the consideration of the affected upstream neighbors.

Item #26 & 27 specifically affects my property (and my immediate neighbors) and it appears you have yet to consider me. The applicant "thinking of a 6' tall chain link fence with slats" is totally inadequate. There is a seeming lack of respect for my family's well being and property value to, consider my conforming residence, be demised by a simple fence against this non-conforming commercial business. I have on multiple occasions requested a 12 ft masonry wall to demise my property from Homewood's non-conforming multi-use project. The fact that this is not addressed anywhere in your documents seems either a major oversight and/or somewhat disrespectful. The Town or Homewood should be more considerate of an abutting residence on this issue.

Item #48 clearly conflicts with Town Code 13.30.90, 6.J as outlined in my letter of Jan 22nd. The inclusion of this item also reflects a concern by the Town that there will be a "significant" air quality impact to this area, which is in conflict with the original MND (further outlined in my letter of Jan 22nd).

Items #59 & 60 refer to the wetlands area(s) to the exclusion of the wetland(s) area(s) already disturbed. The Army Corp of Engineers has policies and procedures referencing wetland protocol.

Item #62 will allow "minor modifications". This further indicates that either the Town is not fully aware of Homewood's full scope of activities or that the Town is willing to, in the absence of a "Development Agreement", allow Homewood's activities go undefined. In either case, the absence of a complete knowledge (along with subsequent and meaningful mitigation, conditioning and legislation) of Homewood's operation is poor planning for this non-conforming project, and thereby will add to the detriment of the abutting residential community.

Item #63 uses the non-binding word "If". But without the rezoning, Homewood's non-conforming operation will not fit the business use of this parcel. To single out this item as a condition seems somewhat presumptive, considering that ALL other conditions become moot respective of this rezoning issue.

Item #66 refers to the Noise Study. I again request an independent peer review for this, and all the other Environmental Reports. As I have outlined in my Jan 22nd letter, this report has flaws and is indicative of the potential for the margin of error that the other Environmental Reports are also flawed. **THIS PROJECT LEAVES NO ROOM FOR MARGINAL ERROR.**

Item #67 requires a low \$500. deposit for mitigation monitoring. As currently planned, this amount is too low for the over 100 aspects of mitigation and conditions placed upon Homewood. The subsequent level of monitoring should be re-considered to include the many community complaints that are sure to follow in the absence of a "Development Agreement".

Item #78 is either in conflict with, or not fully explanatory of, the original MND report concerning business hours of operation. This conflict leads to non-binding issues, as well as, the additional non-binding language respective of (work) activities being located "as far away from existing residences as is feasible". There is also a suspicious exclusion of any language referring to the location of any outside saw(s), which will also become a source for complaints.

Again, I request the Town take better care of me (and my community), as a voter, taxpayer and legal citizen, by creating a "Development Agreement", with Public Workshops, to be binding with Homewood's project.

Item #79. Lighting is yet to be reviewed. The Staff Report indicates that exterior lighting will not illuminate adjacent residential properties. Considering general lighting displacement and the adjacent two story residences along with the lack of interest to properly demise the northern most western edge (Homewood's eastern edge) of my property, I consider the lack of pre-planning this issue an insufficient mitigation (#2, MND) measure which will adversely impact me and my neighbors hundreds of feet away.

Item #87 will require intense monitoring and is otherwise un-realistic, especially during the winter months. I have expounded on this in my letter of Jan 22nd.

Item #99. The parking is insufficient and does not take into account the full width and breadth of Town Code Section 13.36.040(A-4.) and/or Table 3-7. I have expounded on this in my letter of Jan 22nd.

I expect that, as of this writing, you have addressed many of these issues which have already come before you. I respect your difficult position in working with this project. I request that you, please, further recognize the "more than significant" impact to me and the surrounding community created by this, as currently planned, non-conforming business.

In addition, there are many references in the Planning Department reports for the need to condition many items in a "design review approval" process. In consideration of the numerous times these documents use this term, it again emphasizes the fact that Homewood's project requires additional review due to the unknown scope of impact their residentially un-friendly business will have on this community. Please reconsider the planning needs for this project, set aside the current Planning Commission Agenda and advise a more in-depth pre-planning process be embarked upon.

Sincerely,

Kai Krienke

cc: Brian Frাগiao, P.E.
Thomas Millward, Mayor
Perry Beck, Town Manager
Town Council Members; Walt Scherer, Rhonda Morillas, Russ Kelly, Miguel Ucovich
Planning Commission; Greg Obranovich, Janet Thew, Jo-Carol Arisman, Jean Wilson, Micheal Hogan

To the Loomis Planning Commission; Re. Homewood Lumber's new site at the corner of Brace Rd. and Sierra College Blvd. I'm a concerned citizen living off Brace Road. This proposed business is not a good fit for this area. It will be a big eyesore, create too much late night noise, increase the traffic in the area, and probably lower our property values. Why can't Homewood find a different location more suitable to this type of business. Try to put yourself in our position, and try to imagine a business like this going into your neighborhood. You probably wouldn't like it any more than we would. I'm so upset, decisions such as this business being approved, could drive longtime residents like myself out of Loomis. I moved here for the rural beauty, and now this threatens to take that away. Please consider the feelings of the residents when making your decision regarding this matter.

Raymond L. Esperly Sylvia Esperly
1/22/07

**Homewood Lumber Relocation
MND Hearing
January 4, 2007**

Major Comments/Questions and Responses

Names of firms/individuals that need to address the comment/question are in parentheses.

Kai Krenkie (neighbor)

- Would radio communications on the Homewood site interrupt radio transmissions and receipt in the surrounding area?

Homewood does not use any form of loudspeakers or broadcasting to communicate in the yard or in the office. Some yard employees carry walkie-talkies or Nextel units, for internal communications.

- How will requirement to turn off engines be enforced

According to the project applicant, almost all arriving diesel trucks tend to idle for a few minutes, just long enough to cool down, and then are shut off. Departing trucks would idle to warmup for a few minutes before moving on. The same approach is used with forklifts.

The California Air Resources Board prohibits idling of diesel engines for extended periods (more than 5 minutes). The CARB has diesel truck inspectors to enforce such rules, but local governments are also able to write citations. The Town would enforce the rule by responding to any complaints that are received. If a complaint is received, the owner of the business would be notified and the Town would request that the company comply. Staff would also inform the Placer County Air Pollution Control District of the complaint. If an additional complaint is received, staff would again notify the PCAPCD and monitor the business at the times specified in the complaint (possibly asking the sheriff's officers to assist).

The project applicant noted that diesel fuel costs are high enough to provide an incentive to minimize idling.

- Is there a plan for traffic flow within the project site?

Sierra College Blvd is the most direct way to connect to I-80 for East/West traffic, and it would also be the primary thoroughfare for North/ South trips. According to the project applicant, about 90 percent of trucks would enter from Sierra College Boulevard, and then turn left immediately to access the loading area. Some deliveries would go to the office, door assembly building or other enclosed areas. Sierra College is expected to be the primary entrance. Sierra College traffic traveling east would have to turn left onto Brace and then left into the project site, since only right turns will be allowed from and

onto Sierra College. Most traffic would go to the freeway by the shortest route. The applicant estimated that this would be about 70 to 80 percent of trips.

- How will large semi's get through the site during heavy activity?

The two entrances are positioned for easy circulation of traffic from all types of vehicles, including semis

- Will there be any changes to Taylor Road or Sierra College Boulevard?

The future plan is to have 6 lanes on Sierra College Blvd. from I-80 to Taylor Road and 4 lanes from Taylor Road to the north Town limits. There has been talk of caring the 6 lanes to Bankhead Road to lessen the confusion of merging at the railroad tracks west of Taylor Road.

- What does the dotted line represent within the "floodplain fringe"?

The dotted line represents the loading and unloading area. Trucks would be loaded and unloaded in this area, and that material would be staged in the area until it could be loaded onto a truck or moved to the storage area. Parking and driveway would be located outside the dotted line.

- Will flood fringe area be filled or left at current grade? (Hamid)

The flood fringe is intended to be graded to the average elevation of the existing project site, with minimum slope for drainage

- Would Homewood use the spur line across from Taylor Road?

The project applicant explained that lumber businesses can receive lumber on the rail line and have it loaded onto trucks at the spur. However, Homewood has not used the rail line in Loomis, and has no plans to do so. Homewood does use railroad offloading at McClellan and in Woodland.

- People coming from the Auburn area will take the Horseshoe Bar Road exit, and then turn on Brace. He also questioned the trip distribution used in the traffic study.

Sierra College Boulevard to Brace Road would be a shorter route with fewer impediments than using Brace Road as a main access, so Brace Road is not expected to be a main travel route.

Greg Obranovich (Planning Commissioner)

- Concerned about noise, especially in the evening and night, and how it will affect the nearby homes and apartments.

Potential noise impacts are analyzed on pages 54 through 60 of the Mitigated Negative Declaration, based on a noise study prepared by J.C. Brennan & Associates. The project would increase noise compared to existing conditions. The noise analysis provides mitigation to achieve Town noise standards for residential development at the property line, so the nearby homes and apartments should not experience noise levels above the applicable standards. The applicable noise standards include both the 24-hour average, and the standards for short term noise (0 to 60 minutes), as specified in the General Plan.

- Will lighting reach neighbors?

The project is expected to have exterior lighting. Mitigation Measure 2 requires that project lighting not illuminate adjacent residential properties, and that exterior lights be hooded and directed downward.

- Asked for clarification of the proposed improvements to Sierra College Blvd.

As stated above, eventually 6 lanes are planned on Sierra College Blvd. from I-80 to Taylor Road and 4 lanes from Taylor Road to the north Town limits. Access from Sierra College Boulevard to the project driveway will be limited to right turns. In addition, an auxiliary lane is required to be constructed on northbound Sierra College Boulevard to allow trucks to decelerate prior to reaching the driveway. These improvements are now shown on revised Preliminary Site Plan.

- Concerned about the loss of trees

Project impacts on trees are discussed on pages 32 through 34 of the Mitigated Negative Declaration. Approximately 5.2 acres or 60 percent of the project site would be developed. None of the trees within the 3.6-acre floodway would be removed. The trees within the floodway were not evaluated in the Arborist Report, but were mapped using an aerial. Based on the mapping, there appear to be over 250 trees in the floodway portion of the project site, although it is unknown how many of these would meet Town criteria for preservation.

Within the 5 acres to be developed, there are 189 trees meeting the Town criteria for protected trees. Of those 17 trees were recommended for removal due to compromised health and/or structural stability. The project would remove another 132 trees. The project must compensate for the loss of these trees by planting 1,057 trees, paying \$528,000 in fees, or a combination of planting and trees, consistent with the Town Tree Ordinance.

- Could a berm be constructed on the eastern site of the project site to block noise and light and provide a visual separation?

A berm or berm and wall combination would provide visual separation and block noise and light. In order to achieve the Town's noise standards, the 20-foot tall storage building would need to be constructed along the eastern edge (as shown in the site plans).

The storage building would block views of the project site from the east. In order to provide noise attenuation (in the absence of the storage building), a berm or berm/wall would need to be 20-feet tall. A berm or berm/wall north of the storage building would not be needed to reduce noise levels, and the view from the north will be largely screened by the trees in the floodway. The Commission could consider fencing or a wall or a berm on the northern boundary of Phase 2 in order to provide additional screening if deemed appropriate. It should be noted that most of the area north of Phase 2 is in the floodway, and a wall or berm could not be constructed in the floodway.

- Is there enough room to go right on Sierra College Boulevard, then left on Taylor Road

With the improvements at the corner at Sierra College Boulevard and Brace Road being required for this project, there will be enough room to make that turn.

- Where is the major source of noise? Can it be kept away from the homes and apartments?

According to the noise study, the primary sources of noise are forklifts, followed by trucks that are loading and unloading, and, finally, the reciprocal saw (see Table 7 in the Mitigated Negative Declaration). After Phase 2 is constructed, loading and unloading will occur in the northeastern portion of the project site, which would be separated from nearby homes by project buildings and the lumber inventory area. The forklifts would operate in and near the storage building, which is located near residences. However, the noise study concluded that the project can comply with the Town's noise standards by constructing the storage building as a noise barrier. In fact, the large storage building would be required to achieve compliance with the Town's noise level standards. Early morning and late-night activities could still be audible at the adjacent residential areas; however, at levels below the applicable standards.

- What is the amendment to the GC zone?

The amendment is to add "assembly of manufactured goods" to the GC zone. With this amendment, the door assembly operation at Homewood would be clearly allowed under the Zoning Ordinance, and similar operations could occur anywhere within the GC zone. The Mitigated Negative Declaration evaluates the effects of this change.

- The traffic report suggests that access from Sierra College Boulevard should be eliminated in the future, which differs from the proposed plan. This needs to be reconciled.

As stated above, eventually 6 lanes are planned on Sierra College Blvd. from I-80 to Taylor Road and 4 lanes from Taylor Road to the north Town limits. Mitigation Measure 33 requires that the project provide the frontage for the ultimate configuration of Sierra College Boulevard adjacent to the project site, including curb, gutter and sidewalk. Access from Sierra College Boulevard to the project driveway will be limited to right

turns. In addition, an auxiliary lane is required to be constructed on northbound Sierra College Boulevard to allow trucks to decelerate prior to reaching the driveway. This approach was discussed in the traffic study as an alternative to prohibiting access to Sierra College Boulevard in the future (page 15 of the traffic study).

Jo-Carol Arisman (Planning Commissioner)

- Concerned about diesel fumes, particularly from older forklifts

Diesel equipment will be used on the project site. Emissions from diesel engines are most severe during idling. As discussed above, the Air Resources Board limits the amount of time that vehicles can be idled, which would minimize the amount of emissions that would occur on the project site. In addition, the applicant is replacing older forklifts with quieter, more efficient models, which would also produce fewer diesel emissions. The storage building and distance to the loading/unloading area would further reduce the exposure of local sensitive receptors (e.g., residents) to diesel emissions.

- How will lighting affect the RV park

As stated above, project lighting will not be allowed to spill over onto adjacent properties or residences, including the RV park.

- Bicycle parking, ADA parking spots and motorcycle parking are not shown on the site plan

Two Handicap parking places (as required) are shown on the site plan just in front the Sales entry.

Bike parking has not been proposed, but could be included if required by the Town.

- Could pervious surface be used for the loading and unloading area?

Homewood would have to submit a proposal on what material to use. With the high weight of their vehicles and the constant turning of these vehicles, asphalt would work the best. According to the applicant, the paved surface throughout the yard has to be extra thick (minimum 4") pavement with a fabric reinforcement, much as applied in our busy streets. Good surfaces are necessary for forklifts to allow for frequent sharp turns with very heavy loads. Porous surfaces might act in the same way as cracks or potholes which would let water get into the subbase, thereby weakening the support structure and leading to larger failures in the pavement

Jean Wilson (Planning Commissioner)

- Will the storage building adequately buffer the two-story apartments from noise and light?

The storage building would reduce project noise levels enough to be within Town standards at the apartment building (first and second floor). It should be noted that there are no balconies or other outdoor areas on the side of the apartment that faces the project site.

The storage building could also block light. In any case, as discussed above, project lighting will not be allowed to spill over onto adjacent or nearby residences.

- Asked for clarification regarding the timing of Phases 1 and 2

The request is to consider Phases 1 and 2. If the conditions can be met for both phases, they could occur simultaneously.

- The bridge over Secret Ravine on Brace has load limits and is on a list of historic bridges, so it may not be able to handle the type of traffic that would go to Homewood.

The Brace Bridge has load limit signs near the bridge, which would limit its use by loaded trucks. Any truck that will be loaded with lumber would probably use Sierra College Boulevard to the project site. Horseshoe Bar Road and Laird Road have too many tight turns for longer truck beds.

- How far will Sierra College Boulevard improvements go?

As discussed above, Sierra College Boulevard will be widened to 6 lanes from I-80 to Taylor Road and 4 lanes from Taylor to the northern Town limits. The widening is underway, except for the sixth lane, which is the responsibility of adjacent property owners.

- Does the MND take into account relief in traffic from Rocklin due to the interchange improvements?

The traffic study assumed the interchange would be in place under cumulative conditions. The improvements to the interchange are to accommodate the current and future traffic volume. Vehicle traffic will not alter direction because of the interchange.

- What is between the dotted line and solid line in the flood fringe?

This area would be used for driveway and parking.

- The traffic study assumed a 50/50 east-west distribution, rather than the 70 to 80 percent traveling to the freeway cited by Hamid. This information needs to be reconciled

The traffic report assumed that a total of 85% of trips would be on Sierra College Boulevard, with 10% of trips distributed to the north and 75% distributed to the south.

- Asked what will go into the Rippey Road site. Suggested that if the use is less intense on the Rippey site, relocating Homewood could reduce traffic on Horseshoe Bar Road, since Homewood's peak periods are the same as Del Oro High School and the elementary school. Hamid said that he understands the property owner will use the old site for storage.

No project has been proposed for the Rippey Road site at this time. Any uses allowable under the GC zone could be developed on the Rippey Road site, pending Town approval.

- Do the trucks being used have any trouble with the low underpasses?

Some trucks have to get off at Penryn, and then return to Loomis on Taylor Road. According to the applicant, Homewood has never had to concern itself with over-height loads. Lumber loads are usually very dense, and usually reach maximum by weight before reaching volume or height limits. Homewood's truss deliveries that originate in Marysville are always kept within height limits of overpasses.

- Noted that the Biological Assessment refers to Blue Oaks rather than Valley Oaks.

The comment is correct. The Mitigated Negative Declaration correctly uses the term "Valley Oaks".

Hamid Noorani (project proponent)

- What is the schedule for replacement of the Sierra College overpass?

Construction is expected to begin about Spring 2007 and be complete about Spring 2008.

Following pages
are comments
received on Homewood
project.

Comments on Homewood Relocation Project
February 6, 2007

My wife, myself & several on my street are
strongly against this project.

The amount of mitigation required, shows
that this project clearly does not meet
the intent of the zoning for the property.

You absolutely should not approve the project.
This is not a commercial project.

By David Fredrickson

Address 4028 Hunter Oaks Ln.

0
Comments on Homewood Relocation Project
February 6, 2007

WATER DRAINS THRU THESE CREEKS
EVERY WINTER MORE THAN AN INCH OF WATER.
LAST WINTER IT WAS 6" ~~OR~~ TO A FOOT OF
WATER FLOWING THRU THESE CREEKS

By MARIA MONTER

Address 3945 TAYLOR RD

Comments on Homewood Relocation Project
February 6, 2007

Let's keep local business in Leominster
The convenience saves gas and lowers pollution.

By John Browne

Address 4000 Hunter Oaks Dr
5522 Sparks St

RECEIVED

FEB 06 2007

TOWN OF LOOMIS

February 3, 2007

Town Of Loomis
Planning Department
6140 Horseshoe Bar Road
Suite K
Loomis, CA 95650

Reference: 06-10 Homewood Lumber Relocation Project

To Whom It May Concern:

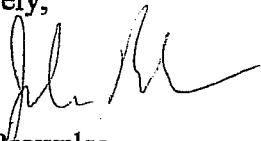
I have reviewed the above referenced project and would like to register my approval as a resident and owner of properties in the Town of Loomis. I am not a builder by profession, but a resident of Loomis for over sixteen years. I think the site is a reasonably, acceptable location between a busy freeway, secondary roads, railroad tracks, vacant land and apartment buildings. Sierra College Boulevard is going to be a major crossroads in the near future with the Bickford Ranch development and other ongoing development planned for Rocklin and Loomis. Taylor Road has long been an industrial frontage road for Highway 40, then Interstate 80, with the same types of businesses. I sorely miss the salvage lumber business that occupied the opposite corner just a few years ago.

Homewood Lumber has been in the town for a long time and provides a very valuable service. I can go there on Saturday mornings for a few two by fours or a bag of concrete and some nails and not generate a lot of pollution, waste time or use a lot of fuel in going to Roseville, Rocklin or Auburn. During the week they provide supplies and services for contractors and homeowners alike. In addition, the sales taxes stay in our town. Local contractors would prefer to trade with a local company, where we know the owner and employees, rather than a faceless national company such as Meeks Lumber, 84 Lumber, Home Depot or Lowe's.

I own property located on Brace Road and elsewhere in Loomis, near the proposed project, and do not find it objectionable. On the contrary I feel it will only serve to increase my property value and keep the cost of City services lower with the infusion of sales taxes.

I have done business with Homewood Lumber for a number of years and would like to maintain that relationship. If they are forced to relocate to another location I may not be able to continue doing so. Let us support local business and keep their sales taxes local. Please consider the above issues when deciding whether to approve or deny this application.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Brownlee', written in a cursive style.

John Brownlee
5522 Sparas Street
Loomis

Ryan

From: Mindi Hogans [mhogans@browermechanical.com]
Sent: Tuesday, January 30, 2007 3:44 PM
To: rwunsch@loomis.ca.gov
Subject: Homewood Lumber

To Planning Commission Persons Concerned:

We are residents of Brace Road and would like to vehemently oppose the new site due to the following concerns:

As you are probably quite aware we are already having traffic issues on Brace Road. Speeding, lots of kids waiting for the buses, traffic jams trying to turn right or left onto Sierra College. Brace Road is the throughfare for everyone from out of town (Folsom, El Dorado Hills, etc.)

Traffic is already backed up on Sierra College. It takes a good long while to get to the left hand turn lane on Taylor Road now.

We understand that this facility will be open 24/7 and will be manufacturing items as well. Our concerns are truck traffic, noise and the possibility of lowering our property values.

We moved to Loomis over 14 years ago and really enjoy our town. I realize that the area in question is zoned commercial, however, something this large does not belong on a mostly residential street. Something quieter with less street traffic would be better.

Please vote no on this project!

Sincerely,

Will and Melinda Hogans
5880 Brace Road
Loomis CA

916 652-4057

RECEIVED

JAN 31 2007

TOWN OF LOOMIS

Ryan

From: Debra Dickmeyer [morrow21@speakeasy.net]
Sent: Monday, January 29, 2007 7:19 PM
To: Ryan
Subject: Re: Request Addresses

RECEIVED

JAN 29 2007

TOWN OF LOOMIS

Bob & Debra Dickmeyer
5854 Brace Road
Loomis, Ca 95650

January 28, 2007

Subject: Proposed Homewood Lumber relocation on Brace Road

Dear Honorable Councilperson and City Manager and Planning Commissioner:

Normally we are extremely quiet people, but the proposed relocation of Homewood Lumber forces me to speak up. This proposal makes no sense, in that they are proposing putting a working lumberyard in a residential area. This proposal will create a number of problems for the families that live on Brace Road. It makes no sense to put this on Brace: 1) because it is a residential area of very nice homes and homes of those who have lived here a number of years, 2) it will most definitely affect the quality of life of the residents by creating truck traffic, on top of the traffic that already uses the road, and 3) it will create unwanted noise of saws, hammering, and whatever else the company will need to complete their assemblies. If Homewood needs more room, then they should look on Rippey Road where they currently reside, where a number of businesses currently reside that are involved in similar activities. I am asking you, as representatives of the people, to reject this preposterous use permit request. It is important to keep Loomis a quality place to live, and in my living here over 20 years, I have never thought in my wildest dreams that our city leaders would even consider such a request.

Thank you for your consideration

Bob and Debra Dickmeyer

1/30/2007

Changes to the MND

Figure 4 on page 8 is revised as shown on the following page.

The first paragraph on page 10 is revised as shown:

The Proposed Project would be constructed in two phases. The first phase would be constructed on southern three acres of the project site, entirely outside of the 100-year floodplain and without any wetlands. This phase would include all of the buildings and ~~2647~~ parking spaces. Based on approval of the Planning Director, another 15 spaces would be provided for overflow in the storage area. The second phase would include area currently in the flood fringe, which contains wetlands, and would be limited to lumber loading and unloading and ~~24~~ 53 parking spaces (eight spaces in the Phase 1 area would be removed as part of Phase 2 access). No permanent structures would be constructed in the floodway, although some temporary storage of, for example, materials waiting to be placed in storage and items to be delivered could occur there.

The sixth and seventh full paragraphs on page 30 is revised as shown:

A wetland delineation was prepared in June 2006 and revised and verified by the Corps on May 8, 2007. The delineation identified a total of ~~0.519~~ 1.278 acres of jurisdictional wetlands on the project site (shown in revised Figure 4). The project site contains three types of jurisdictional wetlands—seasonal drainage, seasonal wetland and roadside ditch~~marsh~~. The seasonal drainage is located along the north and west boundaries, and is characterized by excavated channels. The seasonal wetlands are located in the central portion of the project site, primarily in the area designated Phase 2. A small portion of the seasonal wetlands are located within the floodway, which is not proposed for development. The marsh is located in the northwestern portion of the project site, within the floodway.

~~The delineation has not been verified by the Corps.~~ A Pre-Construction Notification was submitted to the Corps on September 5, 2006, and the 45-day review period lapsed on October 20, 2006, without comment.

The first paragraph of Item c. on page 31 is revised as shown:

The project site contains 1.278 ~~0.519~~ acres of jurisdictional wetlands ~~(pending verification by the Corps).~~ None of the wetlands are located in the Phase 1 area. Most of the wetlands, ~~0.442~~ 1.016 acres, would be filled during Phase 2. The total loss of wetlands would be less than 0.5 acre, so a 404 permit will be required by the Corps. ~~which is not considered a substantial loss under Corps criteria.~~ However, Further, the Town has a “no net loss” of wetlands policy (Natural Resource and Open Space Policy 8b).

Mitigation 10 on page 32 is revised as shown:

10. The project applicant shall purchase wetland credits equivalent to the amount of wetlands to be filled by the Proposed Project, based on a wetlands delineation verified by the US Army Corps of Engineers and/or accepted by the Town's consulting biologist. The Town shall approve the choice of mitigation bank prior to credits being purchased. The purchased credits shall be sufficient to replace the impacted wetland acreage, estimated to be 0.442 1.016 acres. Evidence of payment, which describes the amount and type of habitat purchased at the wetland mitigation bank, shall be provided to the Town prior to issuance of Improvement Plans or building permits.

Mitigation Measure 11 on page 32, shown below, is deleted, because parking would no longer occur within Phase 2 prior to fill of wetlands:

- ~~11. Temporary fencing shall be placed around the wetlands to be avoided during project construction and temporary parking on the Phase 2 site.~~

Mitigation Measure 14 on page 36 is revised as shown:

14. The developer shall inform heavy equipment operators and workers involved with initial site development of the potential archaeological sensitivity of the site. Workers will be instructed as to the types of materials (unusual amounts of stone, bone, or shell) that could indicate an archaeological site.

If construction activities uncover artifacts, bone or exotic rock (particularly obsidian or other evidence of an archaeological site), work shall be suspended within 100 feet of the find. At the developer's expense, and with the approval of the Town of Loomis, a qualified archeologist shall be contacted to examine the deposit and determine its nature and significance. The recommendation of the archaeologist for removal, preservation and/or other treatment shall be implemented. If the resources are determined to be of prehistoric origin and/or of cultural importance to the Native American community, the United Auburn Indian Community shall be notified and consulted regarding disposition of the prehistoric resources. Construction shall not resume until the affected resources have been removed and/or recorded, as recommended by the archaeologist.

Mitigation Measure 21 on page 49 is revised as shown:

21. Prior to grading, the applicant shall demonstrate that on- and off- site drainage facilities are adequate to accommodate additional flows from the project site, consistent with the Town's Stormwater Management Manual and the Placer County Storm Water Management Manual, and subject to approval by the Town Engineer. Placer County Flood Control and Water Conservation District shall be provided a copy of the drainage report for review and comment.

Item f. on page 69 is revised as shown:

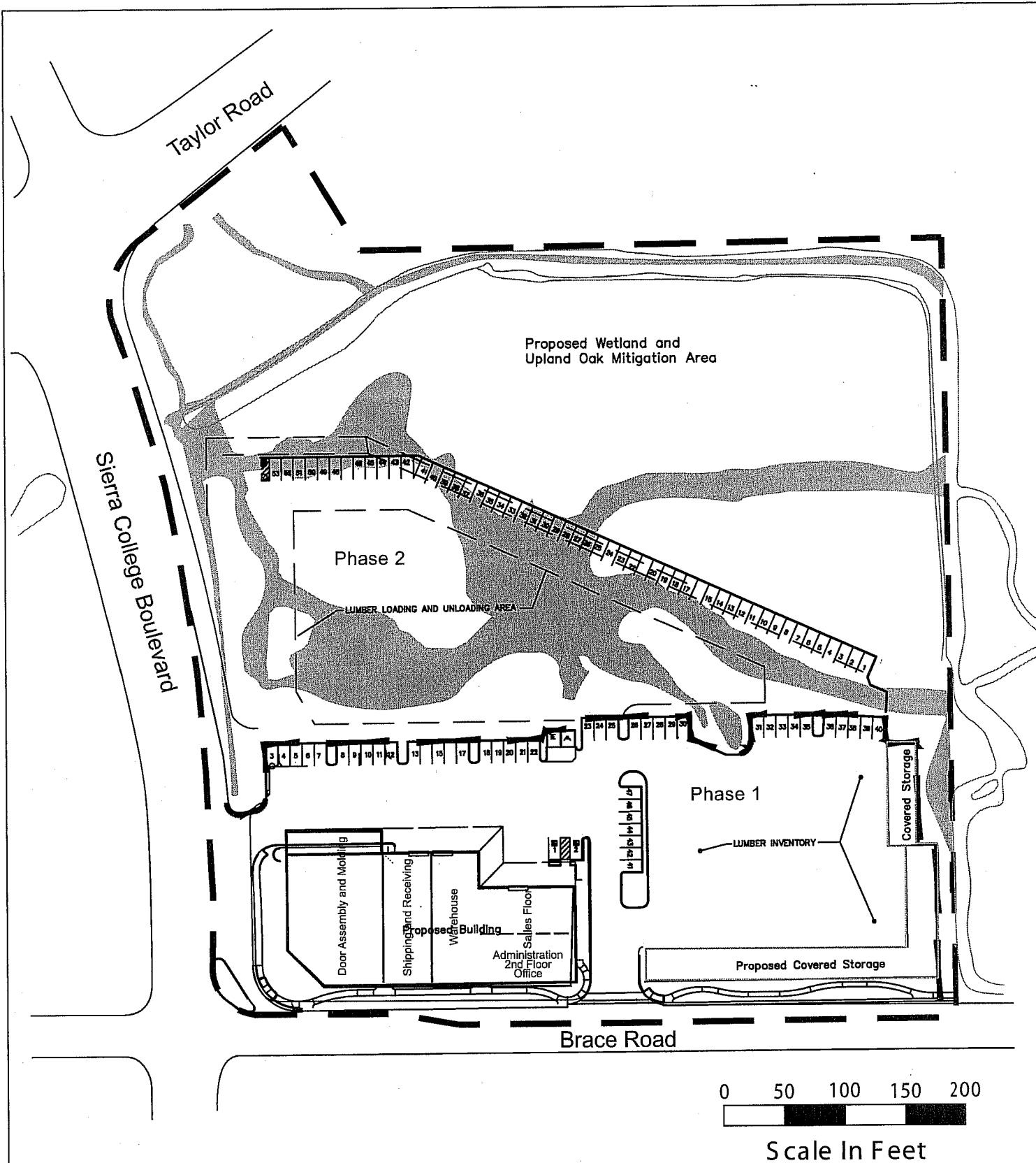
The Proposed Project would not result in the loss of existing parking, and project demand for parking would be met on site, consistent with the Zoning Ordinance (see Table 10). Of the ~~49~~ 82 spaces to be constructed onsite, ~~only 24~~ 47 spaces will be located within Phase 1, with an additional 15 spaces required by Conditions of Approval, for a total of 62 spaces. ~~However, parking will be allowed as needed on the Phase 2 site, which will be graded and provided with a surface suitable for parking, consistent with the wetland permitting and Mitigation Measures 10 through 12 under Biological Resources. Therefore, the Proposed Project will meet its demand for parking under both Phase 1 and Phase 2, and this impact is considered less than significant.~~

Table 10 on page 70 is revised as shown:

Table 10 Parking Demand and Supply				
Use	Square Footage	Zoning Ordinance Requirement (space/square feet)	Parking Demand	Parking Supply
Office	<u>3,200</u> 3,200	1 /200	<u>15.0</u> 16.0	
Retail up to 10,000 square feet	10,000	1 /500	20.0	
Retail/indoor assembly over 10,000 square feet	<u>14,790</u> 12,406	1/1,000	<u>14.8</u> 13.5	
Total	<u>27,990</u> 25,406		<u>50.8</u> 49.5	<u>82</u> 47
Note: Storage and company vehicles not included in calculations				

The first sentence of Item 17(b) on page 74 is revised as shown:

The Proposed Project would contribute to cumulative traffic congestion, air quality degradation, noise, the loss of oak trees, an increase in impervious surface and demand for public services and utilities. As discussed throughout this Initial Study, the Proposed Project's contribution to cumulative impacts would not be considerable with implementation of identified mitigation, so the cumulative impacts of the project would be *less than significant*.



- Project Boundary
- Phase Boundary
- Streamcourses
- Wetlands

Figure 4
Revised Proposed Site Plan